

EXHIBIT 106

Redacted Version of Document Sought to be Sealed

**Full Deposition Transcript of
Jackie Chang,
dated December 16, 2021**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC. MDL No. 2843
CONSUMER PRIVACY USER Case No. 18-md-02843-VC-JSC
PROFILE LITIGATION
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CONFIDENTIAL

REMOTE DEPOSITION OF JACKIE CHANG

Thursday, December 16, 2021

Job No. 4976949

Reported Remotely and Stenographically by:

JANIS JENNINGS, CSR No. 3942, CLR, CCRR

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REMOTE DEPOSITION OF JACKIE CHANG, located
in Hillsborough, California, taken on behalf of the
Plaintiffs, beginning at 9:43 a.m., on Thursday,
December 16, 2021, sworn remotely by Janis Jennings,
Certified Shorthand Reporter No. 3942, CLR, CCRR,
located in the City of Walnut Creek, County of
Contra Costa, State of California.

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WITNESS

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JACKIE CHANG

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EXAMINATION BY MR. LOESER

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4 Exhibit 1 Plaintiffs' Amended Notice of 15

5 Deposition to Jackie Chang

6 Exhibit 2 LinkedIn web page Jackie Chang 21

7 Exhibit 3 Email thread dated 9/30/13 from Ime 57

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10 FB-CA-MDL-02187146 - 2187149

11 Exhibit 4 Email thread dated 5/3/13 from Marie 71

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13 FB-CA-MDL-00191044 - 191047

14 Exhibit 5 Email thread dated 8/16/13 from 86

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17 FB-CA-MDL-00195621 - 195626

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19 FB-CA-MDL-00195627 - 195631

20 Exhibit 7 Email thread dated 8/21/13 from 97

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23 FB-CA-MDL-01128015 - 1128017

24 Exhibit 8 Excel spreadsheet; FB-CA-MDL-01128018 122

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4 Exhibit 9 Message summary dated 4/24/13 from 138

5 Brendan Moore;

6 FB-CA-MDL-02135819 - 2135824

7 Exhibit 10 Email thread dated 8/23/13 from 151

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10 FB-CA-MDL-01754048 - 01754052

11 Exhibit 11 Email thread dated 9/3/13 from Simon 159

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13 FB-CA-MDL-00197163

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16 FB-CA-MDL-00197164 - 197176

17 Exhibit 13 Email thread dated 12/10/13 from 165

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20 Exhibit 14 Email thread dated 2/9/14 from Ime 171

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23 FB-CA-MDL-00202562 - 202563

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4 Exhibit 16 f8 Keynote Section.mp4 189

5 Exhibit 17 Facebook's CEO Mark Zuckerberg F8 189

6 2014 Keynote (Full Transcript)

7 Exhibit 18 Email thread dated 3/23/14 from 198

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10 FB-CA-MDL-01688164 - 1688168

11 Exhibit 19 Email thread dated 9/4/12 from Ime 206

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14 FB-CA-MDL-01680930 - 1680937

15 Exhibit 20 Email dated 10/24/13 from Simon 223

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18 FB-CA-MDL-00199729 - 199730

19 Exhibit 21 Message summary dated 9/3/19 from 229

20 Paul Stepnowsky;

21 FB-CA-MDL-02089985 - 89988

22 Exhibit 22 Email thread dated 3/27/14 from Simon 236

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24 FB-CA-MDL-01943707 - 1943709

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4 Exhibit 23 Email dated 11/21/13 from Jackie 245



8 Exhibit 24 Email thread dated 3/28/14 from 266



12 FB-CA-MDL-01129621 - 1129649

13 Exhibit 25 New York Times article "Facebook 270

14 Gave Device Makers Deep Access to

15 Data on Users and Friends"

16 Exhibit 26 Email thread dated 8/28/14 from 273



20 FB-CA-MDL-00220376 - 220377

23 FB-CA-MDL-01198438 - 1198446

24 Exhibit 28 Message summary dated 10/16/19 from 287

25 Jackie Chang; FB-CA-MDL-02090193

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Exhibit 29 Email dated 3/22/18 from Jack Rooney

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1 THURSDAY, DECEMBER 16, 2021; 9:43 A.M.

2

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4 THE VIDEOGRAPHER: Good morning. We are
5 going on the record at 9:43 a.m. on December 16th, 09:43
6 2021. Please note that the microphones may pick up 09:43
7 background noise, private conversations and 09:43
8 interference if unmuted. When muted, remember to 09:43
9 unmute to speak on the record. Audio and video 09:44
10 recording will continue to take place unless all 09:44
11 parties agree to go off the record. 09:44

12 This is media unit 1 of the video recorded 09:44
13 deposition of Jackie Chang taken by counsel for 09:44
14 plaintiff in the matter of In Re Facebook, Inc. 09:44
15 Consumer Privacy User Profile Litigation, all 09:44
16 related actions, filed in the United States 09:44
17 District Court, Northern District of California, 09:44
18 MDL No. 2843, case No. 18-md-02843-VC-JSC. 09:44

19 This deposition is being conducted via 09:44
20 Veritext Virtual Zoom Technology and all parties are 09:44
21 appearing remotely. My name is Shawna Haynes from 09:44
22 the firm Veritext Legal Solutions and I'm the 09:44
23 videographer. The court reporter is Janis Jennings 09:45
24 from the firm Veritext Legal Solutions. I am not 09:45
25 related to any party in this action, nor am I 09:45

1 financially interested in the outcome. 09:45

2 Counsel and everyone attending remotely will 09:45

3 state their appearances and affiliations for the 09:45

4 record. If there are any objections to proceeding, 09:45

5 please state them at the time of your appearance 09:45

6 beginning with the noticing attorney. 09:45

7 MR. LOESER: Good morning. My name is Derek 09:45

8 Loeser for the plaintiffs from the firm of Keller 09:45

9 Rohrback.

10 MS. WEAVER: Good morning. This is Lesley 09:45

11 Weaver from Bleichmar Fonti. With me is Matt 09:45

12 Melamed and Anne Davis, also of my firm, on behalf 09:45

13 of plaintiffs. Good morning, everybody. 09:45

14 MR. LOESER: And I also have Adele Daniel 09:45

15 from Keller Rohrback. 09:45

16 MR. FALCONER: Good morning. This is Russ 09:46

17 Falconer, with Gibson Dunn & Crutcher, here on 09:46

18 behalf of the defendant and on behalf of the 09:46

19 witness. I'm here with my colleagues Laura Mumm and 09:46

20 Colin Davis, as well as Ian Chen from Facebook. 09:46

21 SPECIAL MASTER GARRIE: Last, Daniel Garrie 09:46

22 with JAMS. I'm the special master. 09:46

23 THE VIDEOGRAPHER: Okay. Anyone else? 09:46

24 Thank you. Will the court reporter please 09:46

25 swear in the witness. 09:46

1 JACKIE CHANG,
2 the witness herein, was sworn and
3 testified as follows:

4 09:46

5 DEPOSITION REPORTER: Thank you. 09:46

6 Please begin, Counsel. 09:46

7

8 EXAMINATION 09:46

9 BY MR. LOESER: 09:46

10 Q. Good morning, Miss Chang. Could you please 09:46
11 state and spell your last name for the record? 09:46

12 A. Chang, C-h-a-n-g. 09:46

13 Q. Miss Chang, have you ever had your 09:46
14 deposition taken before? 09:47

15 A. No. 09:47

16 Q. Okay. Well, there are some ground rules 09:47
17 that make the -- that really are designed to make 09:47
18 the record clear. The first is that we should try 09:47
19 not to talk over each other. I will ask a question. 09:47
20 I'll try to ask a clear question. If you don't 09:47
21 understand the question, please ask me to restate 09:47
22 it. And if you answer the question, I will assume 09:47
23 that you understood the question. 09:47

24 Is that okay? 09:47

25 A. Yes. 09:47

1 Q. And, again, we need to try not to speak at 09:47
2 the same time because it tortures the court 09:47
3 reporter. She can't take down our testimony if we 09:47
4 are talking over each other. 09:47

5 If at any point you need to take a break, 09:47
6 please let me know. I may finish asking a few 09:47
7 questions but, of course, if you would like to take 09:47
8 a break, we will make sure to allow you to take 09:47
9 breaks. 09:47

10 During the testimony, your counsel may 09:47
11 interpose objections and he has every right to do 09:47
12 that. You should answer the question unless you're 09:47
13 instructed not to do so by your counsel. 09:47

14 Do you understand that? 09:47

15 A. Yes. 09:48

16 Q. And you understand that your obligation here 09:48
17 today is to testify honestly and truthfully? 09:48

18 A. Yes. 09:48

19 Q. And that you are under oath? 09:48

20 A. Yes. 09:48

21 Q. Your testimony today is going to cover the 09:48
22 time period from 2007 through 2021. Do you 09:48
23 understand that? 09:48

24 A. Yes. 09:48

25 Q. And that will be the time period that's 09:48

1 covered unless I specifically state otherwise. 09:48

2 Okay? 09:48

3 A. Yes. 09:48

4 MR. LOESER: I'm going to show you what will 09:48

5 be marked as Exhibit No. 1 and that is your 09:48

6 deposition notice. And bear with us while we work 09:48

7 out the clunkiness of the platform here. We are 09:48

8 going to get the document up so you can see it, and 09:48

9 it will also be published via Veritext platform. So 09:48

10 it will be on a screen with the screen share, but 09:48

11 also you will have access to the document via the 09:48

12 Veritext platform. 09:48

13 (Exhibit 1 marked for identification.) 09:49

14 MR. LOESER: We need -- in the world of 09:49

15 Zoom, things always start interestingly. We need to 09:49

16 enable screen sharing so that we can do that. 09:49

17 THE VIDEOGRAPHER: It's enabled now. 09:49

18 BY MR. LOESER: 09:49

19 Q. Miss Chang, this is the deposition notice 09:49

20 that requires your attendance. Have you seen this 09:49

21 before? 09:49

22 A. No. 09:49

23 Q. Do you understand that you're testifying 09:49

24 today in response to a subpoena directing you to 09:49

25 appear to have your deposition taken? 09:49

1 MR. FALCONER: Objection. Foundation. 09:49
2 Go ahead. 09:49
3 THE WITNESS: Sorry. Can you repeat the 09:49
4 question? 09:49
5 BY MR. LOESER: 09:49
6 Q. Sure. Do you understand that your testimony 09:49
7 today is being taken in response to a subpoena that 09:49
8 requires your -- a deposition notice that requires 09:49
9 your attendance? 09:50
10 A. Yes. 09:50
11 MR. LOESER: We can stop sharing that. 09:50
12 BY MR. LOESER: 09:50
13 Q. Miss Chang, what did you do to prepare today 09:50
14 for your deposition? 09:50
15 A. I met with counsel, Mr. Falconer and Miss 09:50
16 Mumm and Mr. Chen, and I can't remember the other 09:50
17 one. 09:50
18 Q. And how many times did you meet with them? 09:50
19 A. I met with them about three times. 09:50
20 Q. And for how much time each time? 09:50
21 A. About three hours. 09:50
22 Q. And did you speak to anyone at Facebook 09:50
23 about your testimony today? 09:50
24 A. No. I mean, Mr. -- Mr. Chen, the counsel 09:50
25 or... 09:51

1 Q. Mr. Chen is in-house counsel at Facebook? 09:51

2 A. Yes. I think so. 09:51

3 Q. And did you review any documents to prepare 09:51

4 for your testimony today? 09:51

5 A. Yes. 09:51

6 Q. And what documents? Can you generally 09:51

7 describe the documents that you reviewed? 09:51

8 A. They appeared to be emails and an Excel 09:51

9 spreadsheet. 09:51

10 Q. And any other types of documents that you 09:51

11 reviewed? 09:51

12 A. Not that I recall. 09:51

13 Q. And how many documents would you say in 09:51

14 total did you review? 09:51

15 A. About maybe four or five. 09:51

16 Q. And were those documents selected by 09:51

17 counsel? 09:51

18 A. Yes. 09:51

19 Q. And did they refresh your recollection as to 09:51

20 any events during the time period that we're 09:52

21 covering today? 09:52

22 A. Sorry, can you -- sorry, in what sense? 09:52

23 Q. Did it remind you of events or occurrences 09:52

24 or whether you saw things you remembered from your 09:52

25 experience with them? 09:52

1 A. Well, I saw the emails, but some of them I 09:52
2 don't really recall too well since it was -- it was 09:52
3 a little far back for me. 09:52

4 Q. And were these all emails that were -- where 09:52
5 you were the sender or the recipient? 09:52

6 A. I believe I was cc'd on them. 09:52

7 MR. LOESER: And, Counsel, we would ask that 09:52
8 you would, obviously, make sure that any material 09:52
9 that Miss Chang reviewed to prepare for this 09:52
10 deposition is produced or has been produced. Do you 09:52
11 know -- 09:53

12 Counsel, do you know if those materials have 09:53
13 all been produced? 09:53

14 MR. FALCONER: Yeah, they have. 09:53

15 BY MR. LOESER: 09:53

16 Q. And Miss Chang, did you review any of the 09:53
17 pleadings or filings in this case to prepare today? 09:53

18 A. No. 09:53

19 Q. Miss Chang, what is your understanding of 09:53
20 what this case is about? 09:53

21 MR. FALCONER: And, Miss Chang, I'm going to 09:53
22 instruct you here. If the only understanding you 09:53
23 have of what the case is about is something you 09:53
24 learned in conversations with counsel, don't reveal 09:53
25 what you learned in those conversations. 09:53

1 If you have an independent understanding 09:53
2 outside of conversations with counsel, you're free 09:53
3 to share that. 09:53

4 THE WITNESS: Well, I believe everything I 09:53
5 know is from counsel. 09:53

6 BY MR. LOESER: 09:53

7 Q. Okay. You've never read anything about this 09:53
8 case in the newspaper or online or anything like 09:53
9 that? 09:53

10 A. Not specifically, no. 09:53

11 MR. LOESER: Counsel, I will just note for 09:53
12 the record that two days ago, Tuesday, December 09:54
13 14th, at 7:09 p.m. Pacific Time, Facebook made 09:54
14 production of 1,807 documents. That production 09:54
15 included 1,204 documents for which this deponent was 09:54
16 a custodian, an additional 65 documents where this 09:54
17 deponent was identified in the metadata or its 09:54
18 directed text.

19 The produced documents from Miss Chang make 09:54
20 up over 25 percent of all the custodial documents we 09:54
21 have received for this deponent. 09:54

22 And I will just note for the record that we 09:54
23 reserve our right to recall this witness because of 09:54
24 this late production. 09:54

25 MR. FALCONER: Great. We'll reserve all 09:54

1 rights as well. 09:54

2 BY MR. LOESER: 09:54

3 Q. Miss Chang, what is your current position at 09:54

4 Facebook? 09:54

5 A. Director of academic partnerships. 09:54

6 Q. And how long have you had that position? 09:54

7 A. Since March. 09:54

8 Q. And who do you report to in that position? 09:54

9 A. Currently or... 09:54

10 Q. Yes, currently. 09:55

11 A. Alvin Bowles. 09:55

12 Q. And what is his position? 09:55

13 A. VP of business ecosystem partnerships. 09:55

14 Q. And who reports to you currently? 09:55

15 A. Brina Collins, Christina Fan and Rachel 09:55

16 Mersey. 09:55

17 Q. And what are each of their jobs? 09:55

18 A. Product programs, research of partnerships 09:55

19 and academic programs. 09:55

20 Q. Miss Chang, what's the total amount of time 09:55

21 you've worked for Facebook? 09:55

22 A. 14 years, a little over. 09:55

23 MR. LOESER: We're going to show you what 09:55

24 will be marked Exhibit 2, which is your LinkedIn 09:55

25 resume, and we'll screen share that as well. 09:55

1 (Exhibit 2 marked for identification.) 09:56

2 BY MR. LOESER: 09:56

3 Q. Miss Chang, I just want to quickly walk 09:56

4 through your resume. I would like to start at the 09:56

5 bottom at your initial experience at Facebook, which 09:56

6 is user operations and the time period is April 2007 09:56

7 to September 2007. Is that accurate? 09:56

8 A. Yes. 09:56

9 Q. And what is it that you did in user 09:56

10 operations during that timeframe? 09:56

11 A. I answered user tickets which were emailed 09:56

12 questions. 09:56

13 Q. So questions from Facebook users? 09:56

14 A. Correct. 09:56

15 Q. And what are the kinds of questions that 09:56

16 Facebook users would ask you? 09:56

17 A. I got locked out of my account. How do I 09:56

18 use this feature? 09:56

19 Q. And were you asked any questions about user 09:56

20 privacy and concerns users had about what was 09:57

21 happening to their content and information? 09:57

22 A. I don't remember specifically. 09:57

23 Q. And after user operations, you were the 09:57

24 global accounts manager, national direct sales, and 09:57

25 that's from 2007 to 2010; is that correct? 09:57

1 A. Yes. 09:57

2 Q. And what is it that you did in that 09:57

3 position? 09:57

4 [REDACTED] [REDACTED] 09:57

5 [REDACTED] [REDACTED] 09:57

6 [REDACTED] [REDACTED] 09:57

7 Q. And what does it mean that you were the 09:57

8 account manager? 09:57

9 A. I would support the ad agency or brands 09:57

10 whenever they made an advertising buy to ensure that 09:57

11 their ad campaign ran as they bought it on our 09:57

12 platform. 09:57

13 Q. And were you involved in determining how 09:57

14 user content information was used in these ad 09:58

15 campaigns? 09:58

16 A. No. 09:58

17 Q. Did you have an understanding of what 09:58

18 content and information was used in ad campaigns? 09:58

19 A. Sorry, in what sense? 09:58

20 Q. How were ad campaigns operated? 09:58

21 MR. FALCONER: Objection. Form. 09:58

22 THE WITNESS: Sorry. I'm not sure. I guess 09:58

23 that's hard to answer in a -- answer. In what 09:58

24 sense? In how I supported it or -- 09:58

25 / / / 09:58

1 BY MR. LOESER:

09:58

[illegible]

19 Q. And were you involved at all in figuring out 09:59

20 who -- what Facebook users would be exposed to that 09:59

21 ad campaign? 09:59

22 A. No. That's -- that would be outside of my 09:59

23 scope. I was focused on supporting the ad campaign. 09:59

24 Q. Okay. So who would be involved in figuring 09:59

25 out what users were exposed to the campaign? Is 09:59

1 that how it would work, someone would advertise on 10:00
2 the platform, that ad would not go to everybody on 10:00
3 the platform, would it? 10:00

4 A. I'm not sure about the technical mechanics. 10:00
5 I would imagine the product team would know. 10:00

6 Q. And was being a global accounts manager a 10:00
7 promotion from user operations? 10:00

8 A. It was a lateral movement. 10:00

9 Q. And then from 2010 to 2014, you were the 10:00
10 strategic partner manager, social commerce and 10:00
11 developer platform. Tell me what you did there. 10:00

12 [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

16 Q. And was that position a promotion from 10:01
17 global accounts manager or a lateral? 10:01

18 A. Lateral. 10:01

19 Q. And how many different partners did you work 10:01
20 with in your capacity as the manager? 10:01

21 A. I don't remember the specific number. 10:01

22 Q. Was it like hundreds, or a few, or what's 10:01
23 your recollection? 10:01

24 A. Sorry. Over -- over what period of time? 10:01

25 Q. [Audio distortion] 2007 to... 10:01

1 A. Sorry. 2010 to 2014 or... 10:01

2 Q. I'm sorry. 2010 to 2014, yeah. 10:01

3 A. I -- again, I don't remember the numbers 10:01

4 specifically, but could be in there, in maybe around 10:01

5 a hundred, I guess, over time. But not all managed 10:01

6 at once or anything. 10:02

7 Q. And, Miss Chang, what is social commerce and 10:02

8 developer platform? 10:02

9 A. Sorry. Can you -- can you repeat that? 10:02

10 Q. Yeah. I'm looking at your job title. It 10:02

11 includes the words "social commerce and developer 10:02

12 platform." Can you tell me what that is? 10:02

13 A. So the developer platform was something we 10:02

14 launched in 2007 which -- which provided APIs and 10:02

15 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

24 Q. And are there other types of verticals other 10:03

25 than commerce verticals? 10:03

1 A. That I managed directly or -- 10:03

2 Q. No, that just exist at Facebook. 10:03

3 A. Yes. There could be gaming, for example. 10:03

4 Q. And as best as you recall, can you just 10:03

5 describe for me the different verticals at Facebook 10:03

6 presently. 10:03

7 A. So presently, it's a bit different. 10:03

8 Q. Okay. 10:03

9 A. Yeah.

10 Q. At this time, how many different verticals 10:04

11 were there in 2010 to 2014? 10:04

12 A. So I don't remember the specific number, but 10:04

13 an example is like gaming, social media, I guess. 10:04

14 Sorry, I can't -- I can't remember all of them. 10:04

15 Q. Can you remember, what did you view as the 10:04

16 main categories of verticals at this time? 10:04

17 A. I was just mostly focused on social 10:04

18 commerce, which was the specific vertical I was 10:04

19 focused on. So I probably have less recollection 10:04

20 around other ones, but the ones that I can recall 10:04

21 right now is gaming, for example. 10:04

22 Q. Let's move to your next position, manager, 10:04

23 Internet.org and mobile inclusion partnerships, and 10:04

24 that's from 2014 to 2017; is that correct? 10:05

25 A. Correct. 10:05

1 Q. And was that a lateral move also? 10:05

2 A. It was a lateral move with a promotion. 10:05

3 Q. And what did you do in that position, 10:05

4 Miss Chang? 10:05

5 A. My focus was to work with our Internet.org 10:05

6 product team, which was focused on launching new 10:05

7 connectivity initiatives to help connect parts of 10:05

8 the world that didn't have Internet access. 10:05

9 My group was specifically focused on content 10:05

10 so that when we enabled access, you know, we would 10:05

11 be able to bring in relevant local content. 10:05

12 Q. And so this was not just in the 10:05

13 United States, but in other countries as well? 10:05

14 A. Correct. 10:05

15 Q. So you were involved in content in other 10:06

16 countries that was published on the Facebook 10:06

17 platform? 10:06

18 A. No, I wouldn't state it that way. Content 10:06

19 in the sense of websites that we would enable access 10:06

20 via the Free Basics or Internet.org service. So it 10:06

21 wasn't related to the developer platform. 10:06

22 Q. And what are "mobile inclusion 10:06

23 partnerships"? 10:06

24 A. Mobile inclusion partnerships consisted of 10:06

25 working with non-profits. So, for example, we would 10:06

1 work with like the WHO, who would focus on creating 10:06
2 content that was localized to help, you know, 10:06
3 perhaps a -- perhaps a very specific region within 10:06
4 Africa to drive awareness around malaria. 10:06

5 And so we would work with groups where there 10:07
6 wasn't content available to be able to localize it 10:07
7 and help address more of, like, you know, global 10:07
8 health issues or localized issues. 10:07

9 Q. And did you work with foreign governments in 10:07
10 this role as well? 10:07

11 A. I've interacted with them, but I didn't 10:07
12 formally do business or anything with them. 10:07

13 Q. So your next position was head of business 10:07
14 platform partnerships. Was that a promotion? It 10:07
15 sounds like a promotion. 10:07

16 A. I would say it was a lateral movement with a 10:07
17 promotion. 10:07

18 Q. And that was from 2017 through September of 10:07
19 2019; is that correct? 10:07

20 A. Correct. 10:07

21 Q. And tell me what you did in that role. 10:07

22 A. Sure. Shifting from Internet.org, I moved 10:07
23 over to focus around how we can enable more local 10:08
24 and small businesses through -- through like 10:08
25 features and offerings. 10:08

1 So, for example, you know, a local 10:08
2 restaurant, being able to help connect their -- 10:08
3 their online reservation system through Open Table 10:08
4 so people can make reservations via their page. 10:08

5 Q. And did you have particular clients or were 10:08
6 you just overseeing the operation? 10:08

7 A. So I didn't work with clients because this 10:08
8 was just platform offerings, so it was more of 10:08
9 integration with APIs. This is different than 10:08
10 advertising sales, which I haven't been in for a 10:08
11 while. 10:09

12 Q. Okay. And we'll get into questions about 10:09
13 APIs. 10:09

14 But so were you helping design what APIs 10:09
15 were made available to these partners on the 10:09
16 platform? 10:09

17 A. I did not design it. I'm not on the product 10:09
18 team. I was mostly working with partners to help 10:09
19 drive adoption. 10:09

20 Q. And what did you do help drive adoption? 10:09

21 [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

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Q. And then moving to your -- the next job from
that is the job you currently hold; is that right,
director of platform product partnerships?

A. Correct.

Q. And that entry in your resume starts with
"Research Platform/Academic Partnerships/Developer
Platform & Business Platform."

Can you explain what all that means --

[Simultaneous talking]

BY MR. LOESER?

Q. -- the tasks that you performed as the
director of platform product partnerships; is that
right?

DEPOSITION REPORTER: Excuse me. Can you
repeat your question, please.

BY MR. LOESER:

Q. Yes. Are -- the line in your resume that
starts, "Research Platform/Academic Partnerships,
Developer Platform & Business Platform," is that a
description of what it is that you are doing as the
director of platform product partnerships?

A. Correct. But I haven't updated it to my
most recent, which is now I'm fully focused on

1 academic partnerships since March. 10:10

2 Q. Okay. Well, let's talk about what's in your 10:10

3 LinkedIn resume right now. 10:10

4 Can you please explain to me what it is that 10:11

5 you are doing as the director of platform product 10:11

6 partnerships before your current transition to just 10:11

7 dealing with academic partnerships? 10:11

8 A. Yes. I would work with product teams, 10:11

9 product teams that include business platform, which 10:11

10 is that, yeah, the example I gave you around Open 10:11

11 Table. I came back to support the developer 10:11

12 platform through its login service, and what that 10:11

13 meant was working with the product team to help them 10:11

14 with their go-to-market strategy so that we could 10:11

15 work with the actual partnerships' teams that were 10:11

16 in market to ensure that they had the right 10:11

17 materials to be able to connect and -- connect with 10:11

18 partners and, you know, help them to adopt these 10:11

19 products. 10:11

20 Q. What do you mean by the "right materials"? 10:11

21 A. "Right materials" meaning ensuring that they 10:12

22 had the right marketing language, meaning just 10:12

23 because you create something, if you can't talk 10:12

24 about it and market it correctly, people wouldn't be 10:12

25 able to understand it. 10:12

1 So ensuring that partner managers who are on 10:12
2 the ground would have the right information to 10:12
3 connect with partners to help them understand what 10:12
4 the product was. 10:12

5 Q. And this describes your role as to research 10:12
6 these different platforms. What did you do to 10:12
7 research the platforms? 10:12

8 A. So currently, I work with the Facebook Open 10:12
9 Research and Transparency Team, where they've 10:12
10 developed researcher APIs so that we can now enable 10:12
11 privacy preserved measures to allow researchers to 10:12
12 use that data for their studies. 10:12

13 Q. And what are -- explain to me what 10:13
14 privacy -- what was the description, of the 10:13
15 measures? Privacy what? 10:13

16 A. Privacy preserving measures. So I'm not the 10:13
17 technical or product owner, so I'll specify that. 10:13
18 But high level, you know, in ensuring that, you 10:13
19 know, information is going through a virtual clean 10:13
20 room, differential privacy applied. I am not an 10:13
21 expert in this, so I don't know the details of how 10:13
22 it all works. 10:13

23 Q. And is this a new task or is this something 10:13
24 that someone else did before you did it? 10:13

25 A. I'm not sure I understand. 10:13

1 Q. This privacy preserving structure, is that 10:13
2 something new, or is that something that previously 10:13
3 existed? 10:13

4 A. So that was created by the product team. 10:13
5 What my team focused on is working with researchers 10:13
6 to drive adoption for that product. So I can't 10:14
7 speak to that -- the specifics of the history of 10:14
8 that product. 10:14

9 Q. And how do researchers drive adoption of the 10:14
10 product? 10:14

11 A. They're able to go through the Facebook Open 10:14
12 Research and Transparency, or FORT, environment and, 10:14
13 you know, they can apply for access. And we work 10:14
14 with researchers when they apply for access and help 10:14
15 get them set up so they can access those APIs -- or 10:14
16 sorry, not APIs, datasets. 10:14

17 Q. Miss Chang, when did you transition to your 10:14
18 current role? 10:14

19 A. March -- 10:14

20 Q. I'm sorry. Go ahead. 10:14

21 A. March 2021. 10:14

22 Q. Okay. And so did someone take over the task 10:14
23 that you previously were responsible for? 10:14

24 A. Yes. It transferred over to another team. 10:15

25 Q. And what team was that? 10:15

1 A. The -- the acronym is PPM, but I'm trying to 10:15
2 recall what the "PPM" stands for. Product partner 10:15
3 marketing. 10:15

4 Q. And who runs that team? 10:15

5 A. Kelly Stonelake. 10:15

6 Q. Have you worked with -- is Kelly a man or a 10:15
7 woman? 10:15

8 A. I believe she -- she's a she. 10:15

9 Q. And had you worked with her before as the 10:15

10 director of platform product partnerships? 10:15

11 A. Yes.

10:15

12 Q. Are there any other jobs or roles that you 10:15
13 performed at Facebook that are not covered by the 10:15
14 resume that we just went through? 10:16

15 A. In what sense? Do you mean like -- sorry. 10:16

16 Q. Did you have any other positions other than 10:16
17 the ones that are listed there? 10:16

A. No. 10:16

18

19 Q. During the time that you have worked for 10:16

20 Facebook, what software systems have you used to 10:16

21 communicate with your colleagues? 10:16

22 A. Sorry. I don't understand. 10:16

23 Q. How did you communicate with your colleagues 10:16
24 over the past 14 years at Facebook? 10:16

25 A. Well, I think it depends on what year it 10:16

1 was. When I first started, you know, we would 10:16

2 have -- we would use Facebook Chat, and then we 10:16

3 would -- we evolved to Workplace Chat, and then 10:16

4 email. 10:16

5 Q. Okay. So you have described three different 10:16

6 things. Are there any other -- I'm calling them 10:17

7 "systems," you might call them something else. 10:17

8 Are there any other systems that you used to 10:17

9 communicate with your colleagues? 10:17

10 A. Not that I recall. 10:17

11 Q. For example, did you use Slack? 10:17

12 A. No. Well, I haven't used Slack, but I can't 10:17

13 speak for others. 10:17

14 Q. WIP, do you use WIP? 10:17

15 A. Yes. But I don't think that's a 10:17

16 communication tool. More of a document tool. 10:17

17 Q. Okay. Let's expand -- have we covered all 10:17

18 the different communication tools that you've used 10:17

19 over the last 14 years? 10:17

20 A. To my understanding. I don't know if you 10:17

21 would classify other types but, yes, email and work 10:17

22 chat. 10:17

23 Q. I assume you talk to your employees; right, 10:17

24 to your -- 10:17

25 A. Oh, yes. I guess, yeah, verbal. 10:17

1 Q. And did you chat with them using your phone? 10:18

2 A. Through apps like Workplace. 10:18

3 Q. But not just using -- what kind of phone 10:18

4 have you had over the last 14 years? Is it an 10:18

5 iPhone? 10:18

6 A. An Apple iPhone. 10:18

7 Q. And did you use the chat feature on your 10:18

8 iPhone to communicate with others? 10:18

9 A. Sorry, which chat feature? 10:18

10 Q. On your iPhone -- is there a chat feature on 10:18

11 your iPhone? 10:18

12 A. I've used -- I've used the Workplace Chat 10:18

13 application. 10:18

14 Q. How about texting? Did you text on your 10:18

15 iPhone with your colleagues regarding work? 10:18

16 A. No. 10:18

17 Q. You never texted your colleagues with your 10:18

18 iPhone? 10:18

19 MR. FALCONER: Objection. Asked and 10:18

20 answered. 10:18

21 BY MR. LOESER: 10:18

22 Q. I'm sorry. You did not text your colleagues 10:18

23 for work-related matters on your iPhone -- 10:18

24 A. Oh, for work, no. 10:19

25 Q. Did you ever utilize a personal email 10:19

1 account for work-related communications? 10:19

2 A. No. 10:19

3 Q. Did you ever send anything from your work 10:19

4 account to your home account to save it for any 10:19

5 particular reason? 10:19

6 A. I mean, I believe I've accidentally sent 10:19

7 something to my personal email just because it may 10:19

8 have auto-populated, but not intentionally. 10:19

9 Q. Okay. So you never thought this is worth 10:19

10 saving or this is important, I'm going to send it to 10:19

11 my home address? 10:19

12 A. No. 10:19

13 Q. Now, we went over your whole time and work 10:19

14 for Facebook. And it sounds like you have done some 10:19

15 work directly involving users; is that right? 10:19

16 That's where you started? 10:19

17 A. Yes, interacting with users in user 10:19

18 operation. 10:19

19 Q. And you also had a position where you 10:19

20 interacted with advertisers; is that right? 10:19

21 A. Correct. Working with advertisers in the 10:19

22 global national sales. 10:20

23 Q. And you also had positions where you 10:20

24 interacted with partners; is that right? 10:20

25 A. Correct. 10:20

1 Q. Now, is there any other category of entities 10:20
2 that utilize Facebook that you interacted with other 10:20
3 than those? Does that cover everything, or are 10:20
4 there other types of Facebook partners or actors? 10:20
5 Do you understand what I'm asking? 10:20

6 A. Can you give an example? 10:20

7 Q. You've interacted with users, you've 10:20
8 interacted with advertisers, you've interacted with 10:20
9 partners. 10:20

10 Is there any other category you've 10:20
11 interacted with or does that cover everything? 10:20

12 A. I think so. 10:20

13 Q. You think that covers everything? 10:20

14 A. Well, I don't know how you -- sorry, I'm 10:20
15 trying to understand the full definition. But to my 10:20
16 knowledge, yes. Yeah. 10:20

17 Q. And you clearly have a lot of experience 10:20
18 with working with partners; is that right? 10:20

19 A. Correct. 10:20

20 Q. Have you been involved in helping form any 10:21
21 policies or procedures at Facebook? 10:21

22 A. In what sense? 10:21

23 Q. In any of the different types of users, 10:21
24 advertisers, partners, were you involved in helping 10:21
25 create policy for any of those groups? 10:21

1 A. No. 10:21

2 Q. Do you have particular things that you would 10:21

3 consider major accomplishments for yourself at 10:21

4 Facebook? 10:21

5 A. I would say the time here in itself and, you 10:21

6 know, working with -- you know, working with 10:21

7 partners on new innovative things, you know, such as 10:21

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 know, new access in different regions of the world. 10:22

13 And then now working with researchers trying to 10:22

14 enable that -- that area too. 10:22

15 Q. And do you feel like you have been able to 10:22

16 influence how Facebook does business with its 10:22

17 partners? 10:22

18 A. In what sense? 10:22

19 Q. In the sense of evolving or changing their 10:22

20 practices or innovating their practices. 10:22

21 A. I guess it's a little broad, but in the 10:22

22 sense that I'm able to help the partners achieve the 10:22

23 goals where it makes sense, yes. 10:22

24 Q. How is the term "partner" used by Facebook? 10:22

25 A. Partner is someone that Facebook is working 10:23

1 with. It doesn't necessarily mean that there's a 10:23
2 monetary exchange, but someone that we would 10:23
3 collaborate with for a larger goal or objective. 10:23

4 Q. And sometimes there's a monetary exchange 10:23
5 with partners? 10:23

6 A. Advertisers, for example, would be a 10:23
7 partner. 10:23

8 Q. Are there other types of partners for which 10:23
9 there is a monetary exchange? 10:23

10 A. I don't know in full depth. It's possible. 10:23

11 Q. What do you mean by "monetary exchange"? 10:23

12 A. I guess that's what I meant by I don't know 10:23
13 fully. So my understanding in terms of advertising, 10:23
14 like if you buy advertising, in that sense. 10:23

15 Q. So people spending money -- paying Facebook 10:23
16 money; right? Is that what advertisers do? 10:23

17 A. Yeah. Not people, but advertisers. 10:24

18 Q. Okay. And are there partners where Facebook 10:24
19 pays the partners money? 10:24

20 A. I imagine there is, but I don't work on that 10:24
21 directly. 10:24

22 Q. But can you identify any of those types of 10:24
23 partners? 10:24

24 A. No, I don't know specifically. 10:24

25 Q. What are the different types of partners 10:24

Page 41

1 that you're aware of? 10:24

2 A. I would say the ones you've listed, 10:24

3 advertisers -- advertisers, developers, anyone that 10:24

4 we worked with in that sense. 10:24

5 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

14 Q. So partners can be advertisers; right? 10:25

15 A. Yes, correct. 10:25

16 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

1 And then I also worked with them when I 10:26

2 moved over to developer platform when they 10:26

3 integrated the Like button plugin. 10:26

4 [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

13 MR. FALCONER: Objection. Form. 10:26

14 THE WITNESS: Sorry.

15 MR. FALCONER: I -- objection. Form. 10:26

16 Go ahead. 10:26

17 BY MR. LOESER:

18 Q. Do you have --

19 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]



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1 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
11 BY MR. LOESER: 10:28
12 Q. Are app developers considered partners? 10:28
13 A. Yes, if -- yes. 10:28
14 Q. And do you know what "data brokers" are? 10:28
15 A. Like generally or... 10:28
16 Q. Yes, generally. 10:29
17 A. Yes. 10:29
18 Q. What are data brokers? 10:29
19 A. They are an entity that may facilitate the 10:29
20 trade of data. 10:29
21 Q. Okay. And they're considered partners as 10:29
22 well at Facebook? 10:29
23 A. I don't know. I don't work with data 10:29
24 brokers. 10:29
25 Q. Do you know -- you mentioned the monetary 10:29

1 exchange aspect. Do you know if there was a 10:29

2 monetary exchange between Facebook and data brokers? 10:29

3 A. I don't know. 10:29

4 Q. Are advertisers sometimes also app 10:29

5 developers? 10:29

6 A. Yes. 10:29

7 Q. Miss Chang, why does Facebook have partners? 10:29

8 A. I think that depends in terms of -- so 10:29

9 Facebook is hard to generalize as one entity. It's 10:30

10 made up of, you know, different groups trying to 10:30

11 drive different goals. And I would say related to 10:30

12 different goals, they may partner to help achieve 10:30

13 that goal. So I can't speak to what every 10:30

14 individual team's goals are. 10:30

15 Q. So let's just think in terms of the partners 10:30

16 with which you've been involved. 10:30

17 A. Okay. 10:30

18 Q. Why does Facebook have those partnerships? 10:30

19 DEPOSITION REPORTER: Excuse me. I lost the 10:30

20 last word. "Why does Facebook..." 10:30

21 BY MR. LOESER: 10:30

22 Q. -- have those partnerships? 10:30

23 [REDACTED]

[REDACTED]

[REDACTED]

1 would be able to provide that data to the 10:32
2 application developer. 10:32

3 BY MR. LOESER: 10:32

4 Q. Okay. And so through the API, a partner 10:32
5 could obtain user content information about users; 10:32
6 is that right? 10:32

7 MR. FALCONER: Objection. Form. 10:32

8 THE WITNESS: I think that depends. I 10:32
9 wouldn't generalize it to that because it would be 10:32
10 dependent on what the developer created and what 10:33
11 they were approved to use. 10:33

12 BY MR. LOESER: 10:33

13 Q. Okay. But there were partners that were 10:33
14 approved to have access to various API permissions; 10:33
15 is that right? 10:33

16 MR. FALCONER: Objection. Form. 10:33

17 THE WITNESS: I imagine so. 10:33

18 BY MR. LOESER: 10:33

19 Q. And don't you, in fact, know so from your -- 10:33
20 from the work you did with partners? 10:33

21 MR. FALCONER: Objection. Form and asked 10:33
22 and answered. 10:33

23 THE WITNESS: So for specific partners for 10:33
24 specific permissions, yes, but I thought you were 10:33
25 trying to speak to it more generally, which I didn't 10:33

1 manage generally. There was an operations team for 10:33
2 that. 10:33

3 BY MR. LOESER: 10:33

4	Q. And when Facebook shares -- when Facebook	10:33
5	shares user information with a third party, what	10:33
6	does that mean to you?	10:33

7 A. I think it depends on what specific -- what 10:33
8 specific group. So in the context of my experience 10:34
9 on the developer platform, it would be through the 10:34
10 developer APIs and the permissions there. 10:34

11 Q. Okay. And I just want to make sure I 10:34

12 understand how you use the terminology. 10:34

13	Through the APIs -- APIs are a way for a	10:34
14	third party that has permission to obtain various	10:34
15	categories of information that Facebook has	10:34
16	collected about the user; is that right?	10:34

17 MR. FALCONER: Objection. Form. 10:34

18 Go ahead. 10:34

19 THE WITNESS: Sorry. Can you restate that? 10:34

20 MR. LOESER: Why don't we just repeat the 10:34
21 question. Would you read the question back, please, 10:34
22 Miss Jennings. 10:34

23 (Record read as follows: 10:34

24 "Q. Okay. And I just want to make sure 10:34

25 I understand how you use the terminology. 10:34

1 Through the APIs -- APIs are a way for a 10:34
2 third party that has permission to obtain 10:34
3 various categories of information that 10:34
4 Facebook has collected about the user; 10:34
5 is that right?")
6 THE WITNESS: No. 10:35
7 MR. FALCONER: Same objection. 10:35
8 BY MR. LOESER: 10:35
9 Q. So APIs are a way for a third party to 10:35
10 obtain various categories of information that 10:35
11 Facebook has collected about a user; correct? 10:35
12 A. Yes. It's a -- it's a vehicle, but I 10:35
13 wouldn't necessarily say -- again, I'm not a 10:35
14 technical person. I don't know if that's all 10:35
15 technically how it's done, but to my understanding, 10:35
16 it sounds right. 10:35
17 Q. Are you familiar with the concept at 10:35
18 Facebook of reciprocity? 10:35
19 A. Yes. 10:35
20 MR. FALCONER: Objection. Form. 10:35
21 Go ahead. 10:35
22 BY MR. LOESER: 10:35
23 Q. Can you explain to me how Facebook uses the 10:35
24 term reciprocity with -- particularly with respect 10:35
25 to partners? 10:36

1 MR. FALCONER: Same objection. 10:36

2 THE WITNESS: My understanding of 10:36

3 reciprocity is a value exchange. 10:36

4 BY MR. LOESER: 10:36

5 Q. And explain what you mean by that. 10:36

6 A. "Value" meaning -- and it doesn't 10:36

7 necessarily mean monetary. So, you know, going back 10:36

8 to partnerships, ensuring that if we're going to 10:36

9 partnerships, there's value in that experience. 10:36

10 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 Q. So is value another way of saying 10:36

16 information? So when there's value -- when there is 10:36

17 reciprocity with a partner, that means that Facebook 10:36

18 is giving that partner some information about users, 10:36

19 and Facebook is obtaining from that partner some 10:37

20 information about users; is that right? 10:37

21 A. Not to my understanding. 10:37

22 Q. It's not your understanding that in exchange 10:37

23 for providing information, Facebook gets back 10:37

24 information? 10:37

25 A. Well, I think it's dependent. So when I was 10:37

1 Facebook studies that information or analyzes it? 10:38

2 A. No. That would be outside my scope. 10:38

3 Q. Do you know if, in fact, information that is 10:38

4 published back is studied and analyzed by Facebook? 10:38

5 A. I don't know. 10:38

6 Q. You don't know if that happens, or you just 10:38

7 don't know anything about it? 10:38

8 A. I just don't know. It is outside my scope 10:38

9 so I can't really speak to it. 10:38

10 Q. And Miss Chang, you worked with partners 10:38

11 with whom there was reciprocity; is that right? 10:39

12 A. In what sense? 10:39

13 MR. FALCONER: Objection to form. 10:39

14 BY MR. LOESER: 10:39

15 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

24 Q. It's an important concept to Facebook; 10:39

25 right? 10:39

1 A. I don't know.

10:39

2 Q. Were you involved in making sure that there 10:39

3 was reciprocity with partners with whom you worked? 10:39

4 A. I don't know in the sense that I -- I'm not 10:39

5 sure I understand. 10:39

6 Q. Well, did you ever, for example, communicate 10:39

7 to your colleagues that some interaction with a 10:39

8 partner was positive because there was progress with 10:40

9 reciprocity? 10:40

10 A. I'm not sure I understand. So when I would 10:40

11 work with a partner, I would try to ensure that I'm 10:40

12 always representing the voice of a partner 10:40

13 holistically, meaning the different ways that we're 10:40

14 working with them, the things that would impact 10:40

15 their business. Not necessarily in the scope of 10:40

16 reciprocity. 10:40

17 Q. But you would also want to make sure that if 10:40

18 Facebook was giving content information to the 10:40

19 partner, that Facebook was getting back some 10:40

20 information; isn't that correct? 10:40

21 A. I didn't regulate that. Well, I guess I'm 10:40

22 having a hard time understanding. Like I don't 10:40

23 regulate that. 10:40

24 Q. You don't recall any examples of where you 10:40

25 were endeavoring to encourage reciprocity? 10:41

1 A. I'm not sure I understand. 10:41

2 Q. Miss Chang, are some partners considered 10:41

3 more valuable to Facebook than other partners? 10:41

4 A. I guess in the -- I guess it depends on what 10:41

5 specific initiative or project. I wouldn't say it's 10:41

6 one holistic stack rank. 10:41

7 Q. Okay. Can you think of any -- any 10:41

8 characteristics of a partner that would make it more 10:41

9 valuable to Facebook than other partners? 10:41

10 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

19 Q. So is a partner that publishes back a lot of 10:42

20 content information considered a valuable partner 10:42

21 for Facebook? 10:42

22 MR. FALCONER: Objection. Form. 10:42

23 BY MR. LOESER:

24 Q. Taking into account on determining whether 10:42

25 that was a valuable partner? 10:42

1 MR. FALCONER: Same objection. 10:42

2 THE WITNESS: Again, I don't know. And I 10:42

3 guess it's kind of hard to generalize it, so I don't 10:42

4 know. 10:42

5 BY MR. LOESER: 10:42

6 Q. So is the value of a partner based on how 10:42

7 much user content information Facebook obtains from 10:42

8 a partner? 10:42

9 MR. FALCONER: Objection. Form. And asked 10:42

10 and answered. 10:42

11 THE WITNESS: I don't know. 10:42

12 BY MR. LOESER: 10:42

13 Q. Miss Chang, are some partners considered 10:43

14 vendors? 10:43

15 A. Yes. Yeah. 10:43

16 Q. So what would a "vendor" be? 10:43

17 A. A vendor would be -- sorry. A vendor would 10:43

18 be someone we buy services from. 10:43

19 Q. Okay. And can you think of any examples of 10:43

20 services that Facebook buys? 10:43

21 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

24 Q. So they would provide a service? That 10:43

25 particular type of partner would provide a service 10:43

1 to Facebook? 10:43

2 A. That partner in the advertising capacity 10:43

3 could also be a vendor. 10:43

4 Q. And a lot of partner arrangements, the 10:43

5 information the partner obtains from Facebook is 10:44

6 used to support that partner's business; is that 10:44

7 right? 10:44

8 MR. FALCONER: Objection. Form. 10:44

9 THE WITNESS: Sorry. I don't understand. 10:44

10 Can you -- can you say it another way or... 10:44

11 BY MR. LOESER: 10:44

12 Q. What is your understanding of what a partner 10:44

13 does when it obtains user content information from 10:44

14 Facebook? 10:44

15 MR. FALCONER: Objection. Form. 10:44

16 THE WITNESS: I don't know. If there's 10:44

17 something more specific... 10:44

18 BY MR. LOESER: 10:44

19 Q. Do you know anything about how Facebook uses 10:44

20 user content information in its advertising 10:44

21 business? 10:44

22 A. No, not technically. 10:44

23 Q. Do you know anything about how Facebook 10:44

24 monetizes information that it obtains from its 10:45

25 partners? 10:45

1 MR. FALCONER: Objection. Form. 10:45

2 Go ahead. 10:45

3 THE WITNESS: Not specifically. 10:45

4 BY MR. LOESER: 10:45

5 Q. Well, generally, do you know? 10:45

6 A. No. I don't -- well, I don't know in the 10:45

7 capacity that -- sorry, if you can give me an 10:45

8 example. 10:45

9 Q. Was that something that you ever discussed 10:45

10 with your colleagues, how Facebook monetizes 10:45

11 information? 10:45

12 A. No, not that I -- that I recall. 10:45

13 Q. Do you know what group at Facebook managed 10:45

14 the relationship with data brokers? 10:45

15 A. No. 10:45

16 Q. Do you know if data brokers were ever app 10:45

17 developers for Facebook? 10:46

18 A. I don't know. 10:46

19 Q. Do you know if data brokers were ever 10:46

20 advertisers for Facebook? 10:46

21 A. I don't know. 10:46

22 MR. LOESER: I will show you what we will 10:46

23 mark as Exhibit 3. We will screen share that as 10:46

24 well. 10:46

25 (Exhibit 3 marked for identification.) 10:46

1 BY MR. LOESER: 10:46

2 Q. This is an email from -- and I'm not sure 10:46

3 I'm saying this name right. Ime Archibong. Do you 10:46

4 know who that is? 10:46

5 A. Yes, Ime Archibong. 10:46

6 Q. Ime Archibong. What is Ime Archibong's job? 10:46

7 A. At this time or... 10:46

8 Q. Yes. 10:46

9 A. I believe he was the director of platform 10:47

10 partnerships. 10:47

11 Q. Okay. So someone who had the job before 10:47

12 you? 10:47

13 A. I didn't have that job. 10:47

14 Q. So the Exhibit 3 is an email from Ime 10:47

15 Archibong to you, dated September 30th, 2013; right? 10:47

16 A. Sorry. Can you repeat that? I was also 10:47

17 reading the email. 10:47

18 Q. I'm just identifying this exhibit for the 10:47

19 record. And it is an email from Ime Archibong to 10:47

20 you dated September 30th, 2013; is that correct? 10:47

21 A. Yes, correct. 10:47

22 Q. And do you see the subject line on that 10:47

23 email? 10:47

24 A. Yes. 10:47

25 [REDACTED]

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[illegible]

12	Q.	What about data that was sold by Facebook?	10:51
13		Were you involved at all with that?	10:51
14	A.	No.	10:51
15	Q.	And are you aware of any data that was sold	10:51
16		by Facebook?	10:51
17	A.	Not to my knowledge, no.	10:51
18	MR. FALCONER:	Derek, can we take a quick	10:52
19		break whenever you are done with this document?	10:52
20	MR. LOESER:	Sure. Now is fine.	10:52
21	MR. FALCONER:	All right.	10:52
22	MR. LOESER:	You want 10 minutes?	10:52
23		minutes?	10:52
24	MR. FALCONER:	Yeah.	10:52
25	THE VIDEOGRAPHER:	This marks the end of	10:52

1 media No. 1 in the deposition of Jackie Chang. 10:52

2 Going off the record. The time is 10:52. 10:52

3 (Off the record.) 10:52

4 THE VIDEOGRAPHER: This marks the beginning 11:14

5 of media No. 2 in the deposition of Jackie Chang. 11:14

6 We are back on the record. The time is 11:14. 11:14

7 BY MR. LOESER: 11:14

8 Q. Miss Chang, Facebook collects content and 11:14

9 information about its users from its partners and 11:14

10 uses that information in its advertising business; 11:14

11 is that correct? 11:14

12 MR. FALCONER: Objection. Form. 11:14

13 THE WITNESS: I can't speak to that broadly, 11:14

14 meaning I don't know the technical specifics to be 11:14

15 able to support that statement. 11:15

16 BY MR. LOESER: 11:15

17 Q. But do you know that generally to be the 11:15

18 case, Miss Chang? 11:15

19 A. No. I -- I don't really feel comfortable 11:15

20 answering because I don't know. 11:15

21 Q. Do you know how Facebook makes money? 11:15

22 A. My understanding is advertising. 11:15

23 Q. And do you know whether advertising collects 11:15

24 and uses user content and information? 11:15

25 MR. FALCONER: Objection. Form. 11:15

1 THE WITNESS: I don't know, meaning I don't 11:15

2 understand the product mechanics around that. 11:15

3 BY MR. LOESER: 11:15

4 Q. What do you understand about the advertising 11:15

5 business at Facebook? 11:15

6 A. Not much since I haven't worked on it since 11:15

7 2010. 11:15

8 Q. Do you know what portion of Facebook's 11:15

9 revenue comes from its advertising business? 11:15

10 A. Not specifically. 11:15

11 Q. Do you have any idea at all? 11:15

12 A. I think a good portion. 11:16

13 Q. And does the advertising business utilize in 11:16

14 any way, as far as you understand it, content and 11:16

15 information that Facebook collects from its 11:16

16 partners? 11:16

17 MR. FALCONER: Objection. Form. 11:16

18 THE WITNESS: Again, I don't know enough 11:16

19 about the technical specifics to make that 11:16

20 assertion. I don't know. 11:16

21 BY MR. LOESER: 11:16

22 Q. Well, I'm not asking about the technical 11:16

23 specifics, just the general concept. Is that 11:16

24 something you understand? 11:16

25 A. I don't know. 11:16

1 Q. Miss Chang, are people who create apps for 11:16
2 Facebook called "developers"? 11:16

3 A. Yes. 11:16

4 Q. Are there other types of developers? 11:16

5 A. I only know of app developers. 11:16

6 Q. And we mentioned APIs before, but can you 11:17
7 please just explain what "APIs" are. 11:17

8 A. Application programming interface. It's a 11:17
9 way for, you know, two -- two services to connect 11:17
10 and speak to each other. 11:17

11 Q. And how does Facebook use APIs with regard 11:17
12 to user content and information? 11:17

13 A. I'm not sure I understand the question. 11:17

14 Q. Do you understand how Facebook uses APIs at 11:17
15 all? 11:17

16 A. Well, Facebook doesn't use the APIs. The 11:17
17 developer -- so, sorry, can you be a little more 11:17
18 specific? 11:17

19 Q. Yeah. How do APIs work at Facebook on its 11:17
20 platform? 11:17

21 A. I think that depends because APIs can be 11:17
22 used in a lot of different cases. Are you speaking 11:17
23 to developer platform or? 11:18

24 Q. Yes. How are -- how do third parties access 11:18
25 user content information through APIs? 11:18

1 A. So they can go through our developer 11:18
2 platform and go through the process of approvals and 11:18
3 submitting their app to access APIs. 11:18

4 Q. Explain that process in as much detail as 11:18
5 you can. 11:18

6 A. Unfortunately, I can't. I don't work on the 11:18
7 operations side. So generally, we prefer them to go 11:18
8 through the flow, and that flow is managed by -- on 11:18
9 the product and operation side. So I can't speak to 11:18
10 the exact process. 11:18

11 Q. Okay. You are familiar with the different 11:18
12 sorts of APIs that Facebook provides for its 11:18
13 third-party access to -- 11:18

14 A. Sorry, you broke up. Can you say that 11:18
15 again? 11:18

16 Q. Have you ever looked at a list of APIs that 11:18
17 are -- that app developers can use if they have 11:19
18 permission to do so? 11:19

19 A. I have looked at developer.Facebook.com, 11:19
20 which has a list of APIs. 11:19

21 Q. Okay. And are you familiar with any of 11:19
22 those APIs? 11:19

23 A. I don't -- probably not, since it's been a 11:19
24 couple years since I've worked on that directly. 11:19

25 Q. For example, are you familiar with the 11:19

1 friends permission APIs? 11:19

2 A. I know what the name is, but I don't know 11:19

3 like the specifics around it. 11:19

4 Q. What do you know about it? 11:19

5 A. I've heard of it, like I've seen the name 11:19

6 like in emails, but I don't remember what it exactly 11:19

7 does and the technical specifics of it. 11:19

8 Q. Do you know what information the friends API 11:19

9 permissions allow a third party to access? 11:20

10 A. I don't recall specifically. 11:20

11 Q. In order to have access to APIs, what does a 11:20

12 developer need to do? 11:20

13 A. So I think that depends. Are you talking 11:20

14 about just the developer platform workflow or... 11:20

15 Q. We can start there, yeah. 11:20

16 A. Sure. On developer platform, they would go 11:20

17 to developer.Facebook.com, go through the documents 11:20

18 and, generally, they would follow the workflow for 11:20

19 approval. 11:20

20 Q. And is there a team that evaluates those 11:20

21 approvals? 11:20

22 A. Yes. 11:20

23 Q. And what about partners? Do they just -- is 11:20

24 that just the only system that exists for them, too, 11:20

25 or is there something else? 11:20

1 MR. FALCONER: Objection. Form. 11:20

2 THE WITNESS: I'm not sure I understand. 11:21

3 BY MR. LOESER: 11:21

4 Q. Do partners just go through the developer 11:21

5 platform you just described, or is there another way 11:21

6 for them to negotiate API permissions? 11:21

7 A. So -- 11:21

8 MR. FALCONER: Objection. Form. 11:21

9 THE WITNESS: So they go through that 11:21

10 process. 11:21

11 BY MR. LOESER: 11:21

12 Q. So there's -- so there's no difference 11:21

13 between how partners access and make use of APIs and 11:21

14 the public, the public -- 11:21

15 A. Sorry I -- 11:21

16 MR. FALCONER: Objection. Form. 11:21

17 BY MR. LOESER: 11:21

18 Q. I'm just trying to understand. We will get 11:21

19 into some documents that maybe will flush this out. 11:21

20 But in terms of the different ways that APIs 11:21

21 are accessed, you have described a way that 11:21

22 developers just go on a platform. And I'm asking 11:21

23 you: Is there a different way for partners that 11:21

24 interact with Facebook? 11:21

25 MR. FALCONER: Objection. Form. 11:21

1 THE WITNESS: So I -- like I think it's a 11:21
2 little broad. So I -- I'm struggling to know 11:21
3 exactly. But, yes, they -- depending on specific 11:21
4 need, they could go through a partnership 11:22
5 organization. 11:22
6 BY MR. LOESER: 11:22
7 Q. And were you involved at all in working with 11:22
8 partners and specifically with regard to the APIs 11:22
9 that they sought permission to utilize? 11:22
10 MR. FALCONER: Objection. Form. 11:22
11 THE WITNESS: Sorry. I don't understand, 11:22
12 like going through the developer platform or... 11:22
13 BY MR. LOESER: 11:22
14 Q. No. Just in your role working with 11:22
15 partners, have you ever had occasion to discuss with 11:22
16 partners the permissions that they wanted for APIs? 11:22
17 A. Yes. 11:22
18 Q. Okay. And explain that process. 11:22
19 A. So I don't remember in detail because it's 11:22
20 been a long time. But they could email us about it, 11:22
21 and we would generally refer them to where they 11:22
22 needed to go. 11:22
23 Q. And do you know when Facebook first started 11:23
24 using APIs with its partners? 11:23
25 A. Sorry. Can you say that -- state that 11:23

1 again? 11:23

2 Q. Do you know when Facebook first started 11:23

3 using APIs with its partners? 11:23

4 A. I'm not sure I understand that question. 11:23

5 Technically, I don't know. 11:23

6 Q. Do you know who came up with the various 11:23

7 APIs that Facebook has? 11:23

8 A. No. 11:23

9 Q. Are you familiar with the concept of Friend 11:23

10 Sharing on the Facebook platform? 11:23

11 A. I think I've heard of it, but I don't know 11:23

12 what it is. 11:23

13 Q. Are you aware that on the Facebook platform 11:23

14 for a period of time, when a friend downloaded an 11:24

15 app, that app could obtain access to that person's 11:24

16 friends via Friend Sharing APIs? 11:24

17 MR. FALCONER: Objection. Form. 11:24

18 Go ahead. 11:24

19 THE WITNESS: I don't remember. 11:24

20 BY MR. LOESER: 11:24

21 Q. You don't remember anything about that? 11:24

22 A. No. 11:24

23 Q. That's not something you were involved at 11:24

24 all in? 11:24

25 A. I don't remember. 11:24

1 Q. That wasn't a significant part of the work 11:24
2 that you did for Facebook? 11:24

3 A. I don't understand. Sorry, I -- I worked on 11:24
4 a lot of things, so I don't know the meaning of 11:24
5 that. 11:24

6 Q. But the work that you did with regard to 11:24
7 Friend Sharing in particular does not stand out for 11:24
8 you as being particularly meaningful? 11:24

9 MR. FALCONER: Objection --

10 THE WITNESS: I don't think I worked on 11:24
11 Friend Sharing. 11:24

12 BY MR. LOESER:

13 Q. Do you know what sort of information is 11:24
14 generally made available through friends 11:25
15 permissions? 11:25

16 A. No, I don't. 11:25

17 Q. Are you aware of whether an app can obtain 11:25
18 information about a person's friends who did not 11:25
19 download the app? 11:25

20 MR. FALCONER: Objection. Form. 11:25

21 THE WITNESS: I don't know. 11:25

22 BY MR. LOESER: 11:25

23 Q. Do you know how many different friends 11:25
24 permissions APIs there are? 11:25

25 A. I don't know. 11:25

1 Q. Are you familiar with the term "high-signal 11:25
2 APIs"? 11:25

3 A. No. 11:25

4 Q. Are you familiar with the read_stream 11:25
5 permissions APIs? 11:25

6 A. I've heard of it. 11:25

7 Q. Okay. What do you know about that? 11:25

8 A. I can't recall. It's been so long, I don't 11:25
9 know. 11:26

10 Q. Do you know who came up with the idea of 11:26
11 friends permissions APIs? 11:26

12 A. No, I don't. 11:26

13 Q. Do you know what purpose it served? 11:26

14 A. No. 11:26

15 Q. Do you know if it was controversial? 11:26

16 A. I don't know. 11:26

17 Q. Do you know if that was a API -- the friends 11:26
18 APIs were often misused or abused by app developers? 11:26

19 A. I don't know. 11:26

20 MR. LOESER: I will show you Exhibit -- what 11:26
21 we marked as Exhibit 4. 11:26

22 (Exhibit 4 marked for identification.) 11:26

23 BY MR. LOESER: 11:26

24 Q. We will share that as well. 11:26

25 Exhibit 4 is an email from Marie Hagman to 11:26

1 Chris Daniels, with a cc to you, dated May 3rd, 11:27

2 [REDACTED] [REDACTED]

3 Do you see that, Miss Chang? 11:27

4 A. Yes. May I read it? 11:27

5 Q. Yes, of course. I'm going to ask you some 11:27

6 specific questions about different parts of the 11:27

7 email string, but -- so we will go through it, but 11:27

8 if you want to take a look at it, go ahead. 11:27

9 A. Okay. 11:27

10 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

14 Q. Okay. And if this email was cc'd to you, 11:28

15 does that mean that you received the email? 11:28

16 A. Yes. 11:28

17 Q. As we go through a lot of these emails, if 11:28

18 you are on the email as a recipient, you don't have 11:28

19 any reason to believe you didn't receive the emails; 11:28

20 right? 11:28

21 A. Sorry. I didn't what? 11:28

22 Q. If you're on an email as a recipient -- we 11:28

23 are going to go through a number of emails -- there 11:28

24 is no reason for you to believe that you did not 11:28

25 actually receive the email; correct? 11:28

1 A. I don't think so. 11:28

2 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 Q. Okay. When you say a "permission," that 11:29

13 means permission to access and use an API; is that 11:29

14 right? 11:29

15 A. Again, I don't know the technical specifics. 11:29

16 Q. Can you use an API if you don't have 11:29

17 permission to use the API? 11:29

18 A. I don't know. 11:29

19 Q. You don't have any understanding of what 11:29

20 "permissions" means in connection with an API? 11:29

21 A. I don't think I understand in -- how the 11:29

22 context you're referring it to. 11:29

23 [REDACTED]

[REDACTED]

[REDACTED]

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[illegible]

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[illegible]

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[illegible]

[illegible]

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MR. FALCONER: Objection. Foundation.

11:37

THE WITNESS: Sorry. Can you say that

11:37

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MR. LOESER: Okay. We can go to the next

exhibit, which should be tab 5.

Actually, if we can go off the record for

one second. Give us three minutes.

THE VIDEOGRAPHER: Okay. Going off the

record. The time is 11:44.

(Off the record.)

THE VIDEOGRAPHER: We are back on the

record. The time is 11:48.

(Exhibit 5 marked for identification.)

BY MR. LOESER:

Q. Miss Chang, we are showing you what's now

been marked Exhibit 5, which we will screen share as

well, which is an email from Constantin, and I'm

sure I will get this last name wrong, but

Koumouzelis. Is that how you say that?

A. Sorry. I'm also trying to update the

Egnyte. I can't even say his last name. I call him

"KP."

11:43

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11:49

1 Q. Okay. So an email from KP to Visha Gupta -- 11:49

2 A. Oh, sorry. Wrong person. Not the same 11:49

3 person. 11:49

4 Q. How do you say this person's last name? 11:49

5 A. I don't know how to say his last name. 11:49

6 Q. Call him "CK." How about that? 11:49

7 A. Okay. 11:49

8 Q. And it is an email sent Friday, August 16th, 11:49

9 and it goes to a number of people. 11:49

10 Visha Gupta, do you know who that is? 11:49

11 A. I think I know. I think I could see his 11:49

12 face, but I don't know well. 11:49

13 Q. Okay. And it also went to Douglas Purdy. 11:49

14 Do you know who that is; right? 11:49

15 A. Yes. 11:49

16 Q. And his job was what? 11:49

17 A. Director of Platform Product, I think. 11:49

18 Q. And there are several other people that 11:50

19 received this email, and you're familiar with who 11:50

20 these people are; right? 11:50

21 A. Yes, I know who they are. 11:50

22 Q. And these are people that you worked with 11:50

23 regularly at the time? 11:50

24 A. Not necessarily regularly. I probably know 11:50

25 them more via emails. 11:50

1 Q. Who is Eddie O'Neil? 11:50

2 A. I believe in 2013, he was a product manager. 11:50

3 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

13 MR. LOESER: Okay. Well, why don't we look 11:50

14 at the attachment. Maybe that will refresh your 11:51

15 recollection. 11:51

16 We will mark Exhibit 6. 11:51

17 (Exhibit 6 marked for identification.) 11:51

18 THE WITNESS: Sorry. Am I supposed to open 11:51

19 it? 11:51

20 BY MR. LOESER:

21 Q. Yes. We can go to Exhibit 6. 11:51

22 A. I don't see anything. 11:51

23 Q. It takes a minute. It's traveling through 11:51

24 space. 11:51

25 A. Oh, okay. 11:51

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[illegible]

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1 [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

7 A. Sorry, where is that one? 11:57

8 Q. It's on screen share, as well, if that's 11:57

9 easier. 11:57

10 A. Okay. Oh, sorry. Yes. 11:57

11 [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

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[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

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[illegible]

[illegible]

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[illegible]

1 [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]

7 Q. You have no recollection of that whatsoever? 12:02

8 A. No. 12:02

9 Q. Do you remember what your job was in 2013? 12:02

10 A. I believe it was a partner manager. 12:02

11 MR. LOESER: I will move to Exhibit 7. 12:02

12 (Exhibit 7 marked for identification.) 12:02

13 BY MR. LOESER: 12:02

14 Q. It will show up shortly and we will screen 12:02

15 share the exhibit as well. It's thinking. You will 12:02

16 get it. We're waiting for the document to load. 12:02

17 Okay. Do you have it? Can you see the 12:03

18 document? There we go. 12:04

19 All right. I'm showing you Exhibit 7, which 12:04

20 is an email from KP. We can agree to call this 12:04

21 person "KP"; right? 12:04

22 A. Yes. 12:04

23 Q. You know who I'm talking to when I say "KP"? 12:04

24 A. Yes. 12:04

25 Q. Okay. And it's an email to Ime Archibong 12:04

1 and yourself; is that right?

12:04

2 A. Yes.

12:04

3 [REDACTED]

19 Q. Okay. Do you want to take --

12:05

20 MR. FALCONER: My apologies. My mic was

12:05

21 muted. I had a form objection to that last

12:05

22 question. Sorry. I was late on that.

12:05

23 BY MR. LOESER:

12:05

24 Q. I'm going to ask you some questions about

12:05

25 this email string, and I can just jump right in or

12:05

1 if you want to flip through the document first, 12:05

2 that's fine too. 12:05

3 A. Yes. If I can have one minute to look, that 12:05

4 would be great. Thank you. 12:05

5 Yes, okay. 12:06

6 Q. Okay. Why don't we go to the beginning of 12:06

7 the email string, so if you flip through to the end 12:06

8 of this document, on the second-to-the-last page, 12:06

9 there's an email from Ime Archibong to you, dated 12:06

10 August 21st, 2013. Do you see that? 12:06

11 A. Yes. 12:06

12 Q. And it has the same subject line we read 12:06

13 before? 12:06

14 A. Yes. 12:06

15 Q. And that email forwards a string -- forwards 12:06

16 an email that you sent down in the paragraph below 12:07

17 it. Do you see that? You sent it at 2:30 a.m. 12:07

18 A. Yes. 12:07

19 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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10 DEPOSITION REPORTER: Excuse me. There was 12:09

12 question, please, Counsel. 12:09

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Page 106

1 MR. FALCONER: Objection. Asked and 12:14

2 answered. 12:14

3 THE WITNESS: Sorry. What was the question 12:14

4 again? 12:14

5 BY MR. LOESER: 12:14

6 [REDACTED]

_____, _____, _____

[illegible][illegible]

_____	_____	_____	_____
_____	_____	_____	_____

[illegible]

[illegible]

[illegible]



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15 MR. FALCONER: Derek, just a reminder, we 12:25

16 have about five minutes until we need to break. 12:25

17



11

1 [REDACTED] [REDACTED]

2 [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED] [REDACTED]

5 [REDACTED] [REDACTED]

6 MR. LOESER: Okay. We can move on from that 12:26

7 exhibit. 12:26

8 BY MR. LOESER: 12:26

9 Q. Now, Miss Chang, you are aware that Graph 12:26

10 API version 1 was replaced with Graph API version 2; 12:27

11 right? 12:27

12 A. I don't know specifically. 12:27

13 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

7

11

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1 [REDACTED] [REDACTED]

2 [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED]

4 A. I don't remember. 12:29

5 Q. Did you receive annual performance reviews? 12:29

6 A. In what year? 12:29

7 Q. In any year. 12:29

8 A. I received a performance review. 12:29

9 Q. And in connection with your performance 12:29

10 review, were you required to describe what you did 12:29

11 during the year that was being reviewed? 12:29

12 A. I believe so, yes. 12:29

13 Q. And in those performance reviews, were you 12:29

14 careful to make sure that you described all of the 12:29

15 important, or at least the most important things, 12:29

16 you worked on? 12:29

17 A. At that time, yes. 12:29

18 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

24 Q. Okay. Would that be generally an accurate 12:30

25 statement, though, that the tasks that you performed 12:30

1 that were important were likely the tasks that were 12:30
2 discussed in your review? 12:30

3 A. I'm not sure. I don't know. 12:30

4 Q. What's the documentation that's created for 12:30
5 performance reviews? 12:30

6 A. I'm not sure I understand. 12:30

7 Q. Do you fill something out to describe the 12:30
8 work you've done? 12:30

9 A. So we have a tool, a performance tool, but I 12:30
10 don't know if that was -- I don't remember if that 12:30
11 was there that year. 12:30

12 Q. Do you recall -- well, what years do you 12:30
13 recall that being there? 12:30

14 A. I don't know -- I don't know specifically 12:30
15 what year, but it's -- I mean, I know it exists, but 12:30
16 I don't remember what year exactly it started. 12:30

17 Q. Do you recall that you generally were 12:30
18 reviewed every year? 12:31

19 A. I don't -- I don't think so. 12:31

20 Q. Okay. And do you recall any paperwork 12:31
21 whatsoever being handed to you in connection with 12:31
22 your performance reviews? 12:31

23 A. Paperwork or... 12:31

24 Q. Did you fill anything out at all? Did you 12:31
25 write anything down to describe the work you did 12:31

1 that was being reviewed? 12:31

2 A. So, again, I think it depends on what year, 12:31

3 but there is a tool. We fill it out, so I don't -- 12:31

4 I guess if you can be more specific. 12:31

5 Q. When you're being reviewed, do the people 12:31

6 you report to write something about you? 12:31

7 A. Generally? 12:31

8 Q. Generally. 12:31

9 A. Yes. 12:31

10 MR. LOESER: Counsel, I don't think we have 12:31

11 received any performance reviews from Miss Chang, 12:31

12 and to the extent any of them discuss any of the 12:31

13 topics related to this case, we would ask to make 12:31

14 sure that those are produced. 12:32

15 MR. FALCONER: Great. And we have just hit 12:32

16 12:30, so let's go ahead and take our lunch break. 12:32

17 It's going to be an hour, so we'll be back at 1:30. 12:32

18 Maybe 1:35, but somewhere in there. 12:32

19 MR. LOESER: Okay. Can we get a count on 12:32

20 time remaining? 12:32

21 THE VIDEOGRAPHER: Sure. Would you like me 12:32

22 to do that once we go off the record or right now? 12:32

23 MR. LOESER: Yeah, that's fine. 12:32

24 THE VIDEOGRAPHER: Okay. This marks the end 12:32

25 of media No. 2 in the deposition of Jackie Chang. 12:32

1 Off the record. The time is 12:32. 12:32

2 (Lunch recess.) 12:32

3 THE VIDEOGRAPHER: This marks the beginning 13:35

4 of media No. 3 in the deposition of Jackie Chang. 13:35

5 We are back on the record. The time is 1:35. 13:35

6 BY MR. LOESER: 13:35

7 Q. Good afternoon, Miss Chang. When we left 13:35

8 off, we were talking about Exhibit 7. And as we 13:35

9 saw, there was an attachment indicated in that 13:35

10 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

12 Do you recall our discussion of that? 13:35

13 A. Sorry. I'm just opening it up. Yes. 13:36

14 MR. LOESER: I would like to introduce as 13:36

15 Exhibit 8 the actual attachment, which we will 13:36

16 introduce as the native file Excel spreadsheet. And 13:36

17 then I will screen share and we can look through 13:36

18 some folders. This might take two hours to upload. 13:36

19 (Exhibit 8 marked for identification.) 13:36

20 MR. LOESER: Oh, look. It's already there. 13:36

21 BY MR. LOESER: 13:36

22 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

1 [REDACTED] [REDACTED]

2 Excel? 13:37

3 A. Yes, the service, yeah. 13:37

4 Q. And is that something -- do you use Excel 13:37

5 regularly? 13:37

6 A. I guess. Not lately, but yeah. 13:37

7 Q. Do you know how to navigate your way around 13:37

8 an Excel file? 13:37

9 A. Yes. 13:37

10 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

1 BY MR. LOESER:

2 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

8 Q. Did you work with partners that were mobile 13:39
9 apps? 13:39

10 A. I worked with partners that may have had a 13:39
11 mobile app, but I did not work holistically on 13:39
12 mobile apps. 13:39

13 Q. Okay. And over the long time that you have 13:40
14 been working with partners, I gather that there were 13:40
15 lots of different types of partners that you worked 13:40
16 with that may have had a number of these different 13:40
17 types of apps. Is that fair to say? 13:40

18 A. Sorry. I don't understand that. You mean 13:40
19 that fall into different categories or... 13:40

20 Q. Yeah. You work maybe with some mobile apps 13:40
21 and some game apps. You work with partners that had 13:40
22 these different types of apps; right? 13:40

23 A. No. I don't know where I could classify 13:40
24 that with specificity. 13:40

25 [REDACTED]

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1 BY MR. LOESER: 13:44

2 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18 MR. LOESER: Counsel, I don't believe we 13:45

19 have received this document, so please make sure 13:45

20 it's been produced. 13:45

21 MR. FALCONER: We'll -- yeah. We'll look 13:45

22 into it. 13:45

23 MR. LOESER: Well, I'm asking you to do a 13:45

24 little more than look into it. If you can please 13:45

25 make sure it's produced, I would appreciate it. 13:45

1 accurate information? 13:47

2 MR. FALCONER: Objection. Form. 13:47

3 THE WITNESS: So, again, I don't -- like I 13:47

4 don't remember this. I don't want to assume like -- 13:47

5 yeah, I don't want to assume anything. 13:47

6 BY MR. LOESER: 13:47

7 Q. I'm not asking you if you remember this 13:47

8 email. I'm asking you if -- you sent this email; 13:47

9 right? 13:47

10 A. That's what it says. 13:47

11 Q. And it was your general practice when 13:47

12 sending email to communicate accurate information; 13:47

13 right? 13:47

14 A. Yes. 13:47

15 Q. And it was not your general practice to 13:47

16 communicate information that you knew to be false; 13:47

17 right? 13:47

18 A. Again, I feel like that's -- I don't know. 13:47

19 Like I don't know what the information is, so my 13:47

20 intent generally is not -- I don't know the 13:47

21 information itself. 13:48

22 Q. Right. I'm not asking you if the 13:48

23 information is or isn't false. I'm asking you if it 13:48

24 is your intent to generally communicate accurate 13:48

25 information in your -- 13:48

1 A. It is my intent to, yes, provide 13:48

2 information. 13:48

3 Q. And you testified you couldn't recall most 13:48
4 of what we talked about with regard to this email. 13:48

5 Is there something else that you can think 13:48
6 of that would refresh your recollection regarding 13:48
7 the events discussed in this email? 13:48

8 A. Not that I know of. 13:48

9 Q. And so would you agree that this email is 13:48
10 the best evidence, that you're aware of, of what you 13:48
11 knew and were thinking at the time regarding these 13:48
12 topics? 13:48

13 MR. FALCONER: Objection. Form and 13:48
14 foundation. 13:48

15 THE WITNESS: So, again, I can't make that 13:48
16 assumption. 13:48

17 BY MR. LOESER: 13:48

18 Q. You can't make the assumption that this 13:48
19 email is the best evidence of what you were thinking 13:48
20 at the time you wrote the email? 13:48

21 A. Correct. I don't know. 13:49

22 Q. But you can't remember -- you can't identify 13:49
23 anything else that would be a more accurate 13:49
24 reflection of what you were thinking at the time you 13:49
25 wrote this email? 13:49

1 A. Correct. I don't -- I don't know, so I 13:49
2 don't know what the expanse is. 13:49

3 Q. Is it fair to say that if this email doesn't 13:49
4 refresh your recollection of the events at the time, 13:49
5 you're not aware of anything else that would? 13:49

6 A. I don't -- I don't know. 13:49

7 Q. You don't know if there is any other 13:49
8 evidence that would refresh your recollection? 13:49

9 A. That question would assume I would know, 13:49
10 which I don't know. 13:49

11 Q. But I'm asking you, do you know of any other 13:49
12 evidence that would refresh your recollection? 13:49

13 A. I don't know. 13:49

14 Q. You don't know if there is any other 13:49
15 evidence that would refresh your recollection? 13:49

16 A. Again, I don't know what I don't know, so I 13:49
17 can't make that assumption that I would know. 13:49

18 Q. And if there were something else that might 13:50
19 refresh your recollection, what might that be? 13:50

20 MR. FALCONER: Objection. Asked and 13:50
21 answered. Lack of foundation. 13:50

22 BY MR. LOESER: 13:50

23 Q. You didn't -- there's not like a recorded 13:50
24 transcripts of communications that you had, as far 13:50
25 as you know, is there? 13:50

1 A. I don't -- to my knowledge, I don't think 13:50

2 so. 13:50

3 Q. Is it fair to say that if someone wanted to 13:50

4 figure out what you were thinking about these topics 13:50

5 at the time of this email, this email would be a 13:50

6 good guide for what you were thinking? 13:50

7 MR. FALCONER: Objection. Form and 13:50

8 foundation. 13:50

9 THE WITNESS: Again, I can't speculate on 13:50

10 that. 13:50

11 BY MR. LOESER: 13:50

12 Q. I'm not asking you to speculate on anything. 13:50

13 I'm just asking you if you think this email would be 13:50

14 a good guide of what you were thinking about the 13:50

15 topics discussed in the email -- 13:50

16 A. Well, that would require me to speculate. 13:51

17 Q. What would it require you to speculate at? 13:51

18 A. You're asking me if I know if this is the 13:51

19 best, which would assume I know what everything is 13:51

20 and I don't know what everything is, so I don't 13:51

21 know. So I can't make that assumption. 13:51

22 Q. Let me be specific. Would you agree that 13:51

23 this email is a good guide of what you were thinking 13:51

24 about the topics discussed in the email at the time 13:51

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25    you sent the email?                                     13:51
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1 MR. FALCONER: Objection. Form. Foundation 13:51

2 and asked and answered. 13:51

3 THE WITNESS: Again, when you say "good," I 13:51

4 don't know where I could like -- where I could say I 13:51

5 know what a definition of good means. 13:51

6 BY MR. LOESER: 13:51

7 Q. I will try one more time. Would you agree 13:51

8 that the email that you wrote is evidence of what 13:51

9 you were thinking about the subjects discussed in 13:51

10 your email at the time you sent the email? 13:52

11 MR. FALCONER: Objection. Excuse me. 13:52

12 Objection. Form. 13:52

13 THE WITNESS: Again, I don't remember. I 13:52

14 know the email is there, so I don't want to 13:52

15 speculate what I was thinking because I don't know. 13:52

16 BY MR. LOESER: 13:52

17 Q. Do you ever go back and read your old emails 13:52

18 to try and understand what you were thinking at some 13:52

19 earlier time? 13:52

20 A. Generally, no. I have a lot of emails. 13:52

21 Q. Have you ever done that? 13:52

22 A. Have I ever looked at an email? 13:52

23 Q. Have you ever gone back and looked at an 13:52

24 email you wrote earlier to refresh your recollection 13:52

25 about what you were thinking at the time on a 13:52

1 subject? 13:52

2 A. I have done that. 13:52

3 Q. And when you've done that, have you found 13:52

4 that you're able to refresh your recollection about 13:53

5 something you were thinking by reading your old 13:53

6 email? 13:53

7 A. That depends. It depends on whether that 13:53

8 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

20 Q. Do you need the question read back? 13:53

21 A. Well, I can tell you, I don't understand the 13:54

22 intent of the question. 13:54

23 Q. How about just answer the question. 13:54

24 A. I don't know. 13:54

25 [REDACTED] [REDACTED]

1 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
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[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]

15 MR. FALCONER: Sorry, I think my audio is 13:54
16 out. I had an objection to that last question as 13:55
17 argumentative. 13:55
18 MR. LOESER: We can go to Exhibit 9. I will 13:55
19 have this document marked as Exhibit 9. This is an 13:55
20 email from Brendan Moore to you, dated April 24th, 13:55
21 2013. 13:55
22 MR. FALCONER: Derek, I apologize. I'm 13:55
23 having a hard time hearing you. Is there any way 13:55
24 you can turn up your audio or move closer to the mic 13:55
25 or anything? 13:55

1 MR. LOESER: Let me try and change -- is 13:55

2 that any clearer? 13:55

3 MR. FALCONER: Yeah. That's a little 13:55

4 better. Thank you. 13:55

5 (Exhibit 9 marked for identification.) 13:55

6 BY MR. LOESER: 13:55

7 Q. Miss Chang, you are looking at an email from 13:55

8 Brendan Moore to, it looks like, himself and also to 13:56

9 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

11 Do you see that? 13:56

12 A. Yes. 13:56

13 Q. Who is Brendan Moore? 13:56

14 A. He was a colleague of mine. 13:56

15 Q. Okay. Do you know what his job was at the 13:56

16 time? 13:56

17 A. He was a data analyst. I don't know if he 13:56

18 was an intern or full time at the time. 13:56

19 Q. And this email, it looks like it forwards a 13:56

20 chat; is that -- is that right? 13:56

21 A. It looks to be. I'm not sure. 13:56

22 Q. Okay. And it appears that you had -- you 13:56

23 were communicating with Mr. Moore via chat and that 13:56

24 he sent that communication to himself and to you; is 13:56

25 that right? 13:56

1 MR. FALCONER: Objection. Foundation. 13:56

2 THE WITNESS: I don't know what his intent 13:57

3 was. I don't know if that was true or not. 13:57

4 BY MR. LOESER: 13:57

5 Q. Well, I'm not asking about his intent. I'm 13:57

6 just looking at the document and trying to 13:57

7 understand what it is. Does it appear to reproduce 13:57

8 a chat that you had with Mr. Moore? 13:57

9 A. I don't know. 13:57

10 Q. Okay. 13:57

11 MR. FALCONER: Derek, can I -- if I 13:57

12 represent that this is just how chats get produced 13:57

13 in discovery, does that help? Is that helpful? 13:57

14 MR. LOESER: That is. Thank you. 13:57

15 BY MR. LOESER: 13:57

16 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

13:59

13:59

13:59

25 I'm sure I'm explaining incorrectly, but from what I 13:59

1 understand, it's some sort of permissioning -- 13:59

2 permissioning system. 13:59

3 Q. Permissioning for partners to get access to 13:59

4 permissions; is that right? 13:59

5 A. Again, I don't know where I can make that 13:59

6 assertion. It's more technical than I'm familiar 13:59

7 with. 13:59

8 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

1 [REDACTED] [REDACTED]

2 Q. Do you know what a "vertical" is? 14:00

3 A. A vertical, I think it depends on what 14:00

4 context it's being used. 14:00

5 [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

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15 MR. LOESER: The next exhibit is Exhibit 10. 14:11

16 (Exhibit 10 marked for identification.) 14:11

17 BY MR. LOESER: 14:11

18 Q. For the record, Exhibit 10 is an email from 14:11

19 KP to Miss Chang, dated August 23rd, 2013, Subject 14:11

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1 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5 Q. Okay. Now, as we -- as I mentioned a moment 14:14

6 ago, this is an email from KP to you that starts an 14:14

7 email string. And the subject is the same as the 14:14

8 subject of the earlier August 21st email that we 14:14

9 talked about. 14:14

10 And if you go down to the email at the 14:14

11 bottom of the first page, or midway through the 14:14

12 first page, it's an email from you to Chris Daniels, 14:14

13 Ime Archibong and KP, with a CC to Simon Cross, 14:14

14 dated August 22nd, 2013. Do you see that? 14:14

15 A. Yes. 14:14

16 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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1 MR. LOESER: We can put that document aside, 14:22
2 and I will introduce Exhibit 11, which for the 14:22
3 record is an email from Simon Cross to Ime 14:22
4 Archibong, Jackie Chang, and KP, dated September 14:22

5 [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED]

7 (Exhibit 11 marked for identification.) 14:23

8 BY MR. LOESER: 14:23

9 Q. So, Miss Chang, if you look at this email, 14:23
10 who is Simon Cross? 14:23

11 A. He was a colleague. 14:23

12 Q. Okay. Was he in the same department or do 14:23
13 you recall what his position was? 14:23

14 A. I think he was a partner manager at this 14:23
15 time. 14:23

16 Q. Okay. Does that mean you were reporting to 14:23
17 him or he was reporting to you? 14:23

18 A. I was reporting to Ime and I had no reports. 14:23

19 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 [REDACTED] [REDACTED]

2 [REDACTED] [REDACTED]

3 MR. FALCONER: Objection. Foundation. 14:24

4 MR. LOESER: All right. Let's turn to the 14:24

5 attachment, which we will introduce as Exhibit 12. 14:24

6 (Exhibit 12 marked for identification.) 14:24

7 BY MR. LOESER: 14:24

8 Q. And I will represent for the record, 14:24

9 Miss Chang, that Exhibit 12 is the document that was 14:24

10 attached to Mr. Cross' email that went to you, among 14:24

11 others. 14:24

12 [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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[REDACTED] [REDACTED]

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1 Do you see this document, Miss Chang? 14:32

2 A. Now, I do. Can I have time to read through 14:32

3 it? 14:33

4 Q. Sure. 14:33

5 A. Okay. 14:33

6 Q. And if you flip through this email string, 14:33

7 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

6 SPECIAL MASTER GARRIE: Sorry. When we get 14:36

8 MR. FALCONER: I was thinking after the 14:36

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9  next -- after we are done with this document.      14:36
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10 MR. LOESER: That's fine. 14:36

11 SPECIAL MASTER GARRIE: And then I would 14:36

12 like all the lawyers to be moved into another room. 14:36

13 Thank you. 14:36

14 BY MR. LOESER: 14:36

15 Q [REDACTED] [REDACTED]

_____, _____, _____

[illegible]

[illegible]

[illegible]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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MR. LOESER: This is a fine time to take a 14:38

20

break, as Special Master Garrie has requested. 14:38

21

THE VIDEOGRAPHER: Okay. This marks the end 14:39

22

of media No. 3 in the deposition of Jackie Chang. 14:39

23

Going off the record. The time is 2:39. 14:39

24

(Off the record.) 14:39

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THE VIDEOGRAPHER: This marks the beginning 15:04

1 of media No. 4 in the deposition of Jackie Chang. 15:04

2 We are back on the record. The time is 3:04. 15:04

3 MR. LOESER: If we could mark as Exhibit 14 15:04

4 the next document, which for the record is an email 15:04

5 from Ime Archibong to Eddie O'Neil and Simon Cross, 15:04

6 [REDACTED] [REDACTED]

7 [REDACTED]

8 (Exhibit 14 marked for identification.) 15:05

9 BY MR. LOESER: 15:05

10 Q. Miss Chang, do you see this email? 15:05

11 A. Yes. 15:05

12 Q. And do you see that the email forwards an 15:05

13 email from Ime Archibong to you and Simon Cross on 15:05

14 the same day, February 9th, 2014? 15:05

15 A. Yes. 15:05

16 Q. What does it mean when an email is marked as 15:05

17 "Importance High"? 15:05

18 MR. FALCONER: Objection. Foundation. 15:05

19 THE WITNESS: That it's of high importance. 15:05

20 BY MR. LOESER: 15:05

21 Q. Okay. And if we look down to the email in 15:05

22 the middle of the page, a little further, there's an 15:05

23 email from you, part of this string, to -- is it 15:05

24 Ime? Ime Archibong? Am I saying that right? 15:06

25 A. Ime. 15:06



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25 exhibit is a video clip that I want to play to you. 15:25

Page 186

1 And it's not very long. And then we'll have a 15:25
2 transcript of it as well to the extent that it is 15:25
3 not clear. 15:25

4 DEPOSITION REPORTER: Excuse me, Counsel, 15:25

5 are you going to want this reported? 15:25

6 MR. LOESER: I think you'll be able to. 15:25

7 It's not -- it's Mark Zuckerberg speaking and he's 15:25

8 not speaking terribly quickly, but we have a 15:25

9 transcript so -- you know what, I wouldn't bother 15:25

10 reporting it. We will just have the transcript 15:25

11 admitted after we play the recording. 15:25

12 DEPOSITION REPORTER: Thank you. 15:25

13 MR. LOESER: Actually, hang on one second 15:25
14 before we do that. If we can go back to the last 15:26
15 exhibit. 15:26

16 BY MR. LOESER: 15:26

[illegible]

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11/11/2011

1. [REDACTED]

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_____, _____, _____

[illegible]

_____, _____, _____

_____, _____, _____

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1 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]

7 MR. LOESER: Okay. We can go to the next 15:29
8 exhibit. 15:29

9 (Exhibit 16 and Exhibit 17 marked for 15:29
10 identification.) 15:29

11 BY MR. LOESER: 15:29

12 Q. Now, having gone through all these emails 15:29
13 now, do you remember the connection between the 15:29
14 introduction of the new platform and the transition 15:30
15 from Graph API version 1 to version 2? 15:30

16 A. I don't remember in specificity like what 15:30
17 date and things around that. This was a lot of 15:30
18 stuff going on that's all blurred together, so not 15:30
19 with like full certainty. 15:30

20 Q. And do you remember, as a general matter, 15:30
21 that when the new platform came on and there was a 15:30
22 transition from the older Graph to the new Graph, 15:30
23 that two of the things specifically that happened 15:30
24 was that friends permissions were publicly 15:30
25 deprecated; right? 15:30

1 MR. FALCONER: Objection. Form. 15:30

2 BY MR. LOESER: 15:30

3 Q. I'm sorry. Let me ask again. 15:30

4 Putting aside the terminology and what Graph 15:30

5 version it was and what platform it was, there was a 15:30

6 new platform that was introduced. And in that 15:30

7 new -- that new platform, Facebook publicly 15:30

8 announced that it was -- that it was deprecating 15:30

9 friend permissions; right? 15:30

10 MR. FALCONER: Objection. Form. 15:30

11 THE WITNESS: I think so. I don't -- I 15:31

12 don't remember specifically like which announcement. 15:31

13 Sorry, there's a lot of F8s, so I think this is what 15:31

14 the picture is, so I don't remember. 15:31

15 MR. LOESER: Yeah. Let's go ahead and play 15:31

16 this. Maybe it will jog your memory. 15:31

17 (Video played.) 15:31

18 MR. LOESER: Let's try this again because 15:31

19 there is an echo. 15:31

20 (Video played.) 15:31

21 BY MR. LOESER: 15:32

22 Q. We'll go through the transcript itself 15:32

23 because there was some echo there. 15:32

24 But you know what an "F8 Conference" is? 15:32

25 A. Yes. 15:32

1 Q. And what we just showed you was from the 15:32
2 April 30th, 2014 F8 Conference. And do you recall, 15:32
3 did you attend that conference? 15:33

4 MR. FALCONER: Objection. Form. 15:33

5 THE WITNESS: I -- actually, I don't 15:33
6 remember. I've been to many, but I don't know the 15:33
7 exact dates of which ones I've gone to, and I've 15:33
8 also missed some, as well, so I don't know which 15:33
9 one. 15:33

10 BY MR. LOESER: 15:33

11 Q. Okay. And I'm going to read for you what 15:33
12 Mr. Zuckerberg just said, and you can tell me if 15:33
13 this refreshes your recollection of whether you were 15:33
14 in attendance at this conference. 15:33

15 What Mr. Zuckerberg said was: 15:33

16 "We've also heard that sometimes you 15:33
17 can be surprised when one of your 15:33
18 friends shares some of your data with 15:33
19 an app. So now we're going to change 15:33
20 this and we're going to make it so 15:33
21 that now everyone has to choose to
22 share their own data with an app 15:33
23 themselves. We think this is really" 15:33
24 important -- "a really important step 15:33
25 for giving people power and control 15:33

1 over how they share their data in 15:33

2 apps." 15:33

3 Do you recall Mr. Zuckerberg saying that? 15:33

4 A. Again, I don't remember. A lot of these all 15:33

5 blurred together, so I don't remember that specific 15:34

6 one. 15:34

7 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 Q. Okay. And so when Mr. Zuckerberg is talking 15:34

18 about how friends permissions were going away, at 15:34

19 the time he was saying that in April 30th, 2018 15:34

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 Q. Let's go back to your February 9th, 2014 15:35

2 email, which is Exhibit 14. And, again, what you 15:35

3 wrote was: 15:35

4 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

1 A. Yes. 15:37

2 Q. Now, Mr. Chang, you knew at the time -- 15:37

3 A. Sorry, Mrs. 15:37

4 Q. Miss Chang. I'm sorry. 15:37

5 A. Yeah. 15:38

6 [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

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[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

22 Q. So that's a yes? 15:39

23 MR. FALCONER: Objection. Foundation and 15:39

24 form. 15:39

25 / / / 15:39

15:39

[illegible]

1 [REDACTED] [REDACTED]
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[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]

11 Q. Now, Mr. Zuckerberg said: 15:40

12 "We're going to make it so that now 15:41

13 everyone has to choose to share their 15:41

14 own data with an app themselves." 15:41

15 Is that right? 15:41

16 A. Correct. 15:41

17 Q. And yet, for those apps and developers that 15:41

18 had continued access to friend data, that wasn't 15:41

19 true; right? 15:41

20 A. I -- I don't think so, because I think what 15:41

21 you're saying is that users have to choose. And a 15:41

22 permission, from my understanding, is the ability to 15:41

23 generate dialogue to ask for permission. So the 15:41

24 user would still have to choose to provide it. 15:41

25 Q. So when a private API provides a partner 15:41

1 with access to friend data permissions, right, that 15:41

2 partner can access friend data through that 15:41

3 permission; is that right? 15:41

4 A. My understanding -- 15:41

5 MR. FALCONER: Objection. Objection. Form. 15:42

6 THE WITNESS: My understanding is that it's 15:42

7 the ability to ask a user for that. 15:42

8 BY MR. LOESER: 15:42

9 Q. And -- now, you didn't hear Mr. Zuckerberg 15:42

10 say at that keynote address that there was a 15:42

11 population of partners that would continue to have 15:42

12 access to friends data, did you? 15:42

13 A. No, I didn't hear that. 15:42

14 Q. And, Miss Chang, do you recall that you -- 15:42

15 that you attended that conference and you were 15:42

16 involved in -- you had a presentation yourself 15:42

17 there? 15:42

18 A. I don't know if it was that year. I have 15:42

19 been involved at F8. I have been a couple years. I 15:42

20 don't know if it was that specific one. 15:42

21 So, yes, it could be possible. I just -- I 15:43

22 don't remember that specific one. 15:43

23 MR. LOESER: Okay. We can go to the next 15:43

24 exhibit. It's Exhibit 18. 15:43

25 (Exhibit 18 marked for identification.) 15:43

1 BY MR. LOESER: 15:43

2 Q. Miss Chang, you are looking at an email from 15:43

3 yourself to Deborah Liu, among others, dated March 15:44

4 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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A. Is it okay if I read through?

15:46

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Q. Yeah, please.

15:46

12

A. Thank you.

15:46

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Q. I just have a couple questions, so if you

15:46

14

want to skim it, you can probably save yourself some

15:46

15

time.

15:46

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A. Okay. Yes. Okay.

15:46



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[illegible]

[illegible]

18 MR. LOESER: Exhibit 19. 15:54

19 (Exhibit 19 marked for identification.) 15:55

20 BY MR. LOESER: 15:55

21 Q. This is an email -- Exhibit 19 is an email 15:55

22 string from Ime Archibong to, among others, you, 15:55

25 is very long string, and I'm going to start at the 15:55

1 very, very end of it and work through it. 15:55

2 So first, if you want to take a minute to 15:55

3 familiarize yourself with it, that's fine, and I 15:55

4 will ask you some specific questions that -- 15:55

5 A. Yes, please. 15:55

6 Q. Okay. Are you ready to answer a few 15:59

7 questions about this document? 15:59

8 A. I didn't read it fully, but sure. 15:59

9 Q. Okay. And then, I think you'll -- we will 15:59

10 work our way through it. 15:59

11 A. Okay. 15:59

12 Q. If you need to look at it more, that's, of 15:59

13 course, fine. 15:59

■ [REDACTED] ■

■ [REDACTED] ■

■ [REDACTED] ■

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16:08

1 break. 16:08

2 THE VIDEOGRAPHER: This marks -- this marks 16:08

3 the end of media No. 4 in the deposition of Jackie 16:08

4 Chang. Going off the record. The time is 4:08. 16:08

5 (Off the record.) 16:08

6 THE VIDEOGRAPHER: This marks the beginning 16:22

7 of media No. 5 in the deposition of Jackie Chang. 16:22

8 We are back on the record. The time is 4:22. 16:22

9 BY MR. LOESER: 16:22

10 Q. Miss Chang, we've talked a lot about the 16:22

11 planning for the rollout of Platform 3, and I want 16:22

12 to make sure the record is clear on what happened in 16:23

13 that planning and after the rollout. 16:23

14 As we saw in the materials we went through, 16:23

15 the new Platform 3 deprecated friends permissions 16:23

16 and read permissions; is that right? 16:23

17 A. Sorry. What are you referencing to? Or am 16:23

18 I supposed to look at a document? 16:23

19 Q. No, you don't need to look at a document. I 16:23

20 just -- we have been through the documents. I just 16:23

21 want to make sure it's clear to the -- clear on the 16:23

22 record that those documents showed that with 16:23

23 Platform 3, friends permissions and read permissions 16:23

24 were deprecated; right? 16:23

25 A. Again, I don't know specifically so whatever 16:23

1 permissions, for example, who would you go ask to 16:25

2 find that out? 16:25

3 A. That's not possible. 16:25

4 Q. It's not possible for an academic researcher 16:25

5 to have access to friends permissions? 16:26

6 A. No. We don't offer that through the 16:26

7 researcher API. 16:26

8 Q. And when you were working with other types 16:26

9 of partners, if you wanted to find out if that 16:26

10 partner had access to friends permissions, do you 16:26

11 have any recollection at all as to who you would go 16:26

12 to to find that out? 16:26

13 A. I don't know -- I don't know specifically 16:26

14 off the top of my head. I don't know, but I 16:26

15 don't -- yeah. 16:26

16 Q. So, again, I want to make sure I understand 16:26

17 and use the right terminology. If a developer or 16:26

18 partner continued to have access to deprecated 16:26

19 permissions, does that by definition mean that the 16:26

20 app or partner was whitelisted? 16:26

21 A. Say that again, please. 16:26

22 Q. If a developer or partner continued to have 16:26

23 access to deprecated permissions after Platform 3 16:26

24 was implemented, does that by definition mean that 16:26

25 the app or partner was whitelisted? 16:27

1 MR. FALCONER: Objection. Form. 16:27

2 THE WITNESS: I don't know. 16:27

3 MR. FALCONER: Go ahead. 16:27

4 THE WITNESS: Sorry. I don't know in 16:27

5 specificity in terms of like what you're referring 16:27

6 to, meaning the technical language, I don't know. I 16:27

7 don't know if it's a whitelist. I don't know. 16:27

8 BY MR. LOESER: 16:27

9 Q. Okay. Do you know if whitelisting is one 16:27

10 way the developer or partner continue to have access 16:27

11 to deprecated permissions, but that there are other 16:27

12 ways as well? 16:27

13 A. I don't know. 16:27

14 Q. And is it your understanding that a partner 16:27

15 that has a private API, and through that private API 16:27

16 gets access to friends permission, is that 16:27

17 considered a whitelist, or is that something 16:27

18 different? 16:27

19 A. So, again, I don't -- I don't remember or 16:27

20 know what that would be. 16:27

21 Q. Okay. Do you know if Facebook whitelisted 16:28

22 certain app developers so that they had continued 16:28

23 access to friends permissions after Platform 3 was 16:28

24 implemented? 16:28

25 A. So, again, I don't remember it so I don't 16:28

1 know if it could be classified as whitelist. 16:28

2 Q. The term "whitelist" is not one you have 16:28

3 used so frequently that you remember to this day 16:28

4 what it means? 16:28

5 A. No. 16:28

6 Q. Do you have any idea of the process that's 16:28

7 used to determine if an app developer or partner is 16:28

8 whitelisted so that they have continued access to 16:28

9 friends permissions? 16:28

10 A. Yeah. I don't recall it. 16:28

11 Q. Do you know if Facebook keeps records of 16:28

12 whitelisted developers/partners? 16:28

13 A. I don't know. 16:28

14 Q. You have no recollection at all as to 16:28

15 whether that information is collected and maintained 16:29

16 in one place so that someone could easily find out 16:29

17 who are all of the whitelisted partners or 16:29

18 developers? 16:29

19 A. So again -- 16:29

20 MR. FALCONER: Asked and answered. 16:29

21 THE WITNESS: -- that's outside my scope, so 16:29

22 I don't know. 16:29

23 BY MR. LOESER: 16:29

24 [REDACTED]

[REDACTED]

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1 MR. FALCONER: Derek, you're on mute. I 16:32

2 don't know if you did that on purpose. 16:32

3 MR. LOESER: I did not do that on purpose. 16:32

4 BY MR. LOESER: 16:32

5 Q. So if we can go back to Exhibit 8. 16:32

6 DEPOSITION REPORTER: Excuse me, Counsel,
7 which exhibit?

8 MR. LOESER: This is Exhibit 8. This is an 16:32

9 Excel file. 16:32

10 BY MR. LOESER:

11 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

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3 BY MR. LOESER: 16:34

4 Q. Did you have any interaction with a partner 16:35

5 in a discussion of the information -- the 16:35

6 permissions the partner was interested in, where 16:35

7 they said to you, Hey, we want to arrange so that we 16:35

8 have permission to access friends_video? 16:35

9 A. I don't remember specifically like 16:35

10 individual permissions. 16:35

11 Q. Okay. Do you remember any conversations at 16:35

12 all about friends permissions with any partner? 16:35

13 A. I don't remember specifically anything about 16:35

14 friends permission. 16:35

15 Q. Do you remember anything generally about 16:35

16 friends permissions? And particularly, I'm asking 16:35

17 if any partner that you have worked with raised that 16:35

18 as a permission that they were interested in gaining 16:35

19 access to. 16:35

20 A. I don't -- I don't -- I don't recall. 16:35

21 MR. LOESER: Okay. We can go to Exhibit 21. 16:36

22 (Exhibit 20 marked for identification.) 16:36

23 MR. LOESER: Oh, is it 20? Yeah. 16:36

24 While that's being loaded, for the record, 16:36

25 this is an email from Simon Cross to, among others, 16:36

[illegible]

1 [REDACTED] [REDACTED]

2 A. I don't recall it specifically. 16:38

3 Q. Do you recall it at all? 16:38

4 A. No, I don't. 16:38

5 Q. And can you tell me what "app-based GKs" 16:38

6 are? 16:38

7 A. I don't know. 16:38

8 Q. You have no recollection whatsoever? 16:38

9 A. No. Again, I'm not -- I'm not the technical 16:38

10 person, so I just don't -- I don't know technically 16:38

11 what it would mean. 16:38

12 Q. Okay. Do you know what the Capabilities 16:38

13 tool was? 16:38

14 A. Not specifically. I've heard of it, but I 16:38

15 don't know it in detail. 16:39

16 Q. Well, what have you heard about it? 16:39

17 A. It looks like some sort of permissioning 16:39

18 tool. 16:39

19 Q. And what does that mean? 16:39

20 A. It grants permissions. 16:39

21 Q. Who does it grant permissions to? 16:39

22 A. So, again, I don't -- I don't know the 16:39

23 technical specifics, so I don't feel comfortable 16:39

24 talking about it in depth because I might 16:39

25 mischaracterize it. 16:39

1 Q. Okay. You've said all that you feel 16:39

2 comfortable saying about it? 16:39

3 A. Well, like all that I know about it. 16:39

4 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

9 BY MR. LOESER: 16:42

11 A. I believe it was partner manager. 16:42

12 [REDACTED]

1 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]

9 Q. Now, as the partner manager, were you aware 16:44
10 of that use for capabilities? 16:44

11 A. I'm not sure I understand. 16:44

12 Q. Did you use the capabilities tool at all in 16:44
13 your position at the time? 16:44

14 A. I don't remember. There's a lot of tools, 16:44
15 so I don't remember this one specifically. 16:44

16 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

22 MR. LOESER: If we can go to Exhibit 22? 16:45

23 (Exhibit 21 marked for identification.) 16:45

24 MR. FALCONER: This is Exhibit 21; right? 16:46

25 MR. LOESER: Yeah. 16:46

1 BY MR. LOESER: 16:46

2 Q. Miss Chang, I'm showing you Exhibit 21, 16:46

3 which is an email from Paul Stepnowsky to, among 16:46

4 others, you. This is dated September 3rd, 2019, and 16:46

5 it contains a chat message; is that right? 16:46

6 A. Yes, I see that. 16:46

7 Q. And so in 2019, what was your position at 16:46

8 Facebook? 16:46

9 A. I believe it was product partnerships. 16:46

10 Q. Who is Paul Stepnowsky? 16:46

11 A. I don't remember specifically. 16:46

12 Q. Okay. So on September 3rd of 2019, there 16:46

13 was this chat, and it starts with Paul Stepnowsky 16:47

14 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

17 Do you -- first of all, is "TechCrunch" a 16:47

18 publication? 16:47

19 A. Yes. 16:47

20 Q. Are you familiar with that publication? 16:47

21 A. I know what it is, yes. 16:47

22 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[illegible]

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1 [REDACTED] [REDACTED]

2 [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED] [REDACTED]

5 MR. LOESER: We can go to the next exhibit. 16:54

6 This should be Exhibit 22 by my count. My tabs are 16:55

7 off now, so I will be making a lot of mistakes, I'm 16:55

8 sure. 16:55

9 MR. FALCONER: They are off by 1. It would 16:55

10 be easier if they were off by like 46. 16:55

11 (Exhibit 22 marked for identification.) 16:55

12 BY MR. LOESER: 16:55

13 Q. Miss Chang, I'm showing you what's been 16:55

14 marked Exhibit 22, which is an email from Simon 16:55

15 Cross to Eddie O'Neil, dated March 27, 2014. 16:55

16 [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[illegible]



114

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[illegible]

25 Q. Did you have any involvement at any point in 17:03

1 your career at Facebook with screening third-party 17:03
2 developers before -- well, strike that. 17:03
3 Do you know whether Facebook screened 17:03
4 third-party developers or their apps before granting 17:03
5 them access to Graph API? 17:03
6 A. I -- 17:03
7 MR. FALCONER: Object to form. 17:03
8 THE WITNESS: Sorry. I don't understand. 17:03
9 Can you give me an example. 17:04
10 BY MR. LOESER: 17:04
11 Q. Sure. Let me ask again. Do you know 17:04
12 whether Facebook screens apps or developers before 17:04
13 allowing them to access the Facebook Graph? 17:04
14 MR. FALCONER: Objection. Form. 17:04
15 Go ahead. 17:04
16 THE WITNESS: So we have like a public 17:04
17 workflow that has a developer operations team that 17:04
18 reviews the apps, so I don't -- I don't know if 17:04
19 that's what you're referring to. 17:04
20 BY MR. LOESER: 17:04
21 Q. And do you know anything about the process 17:04
22 for reviewing apps, how that's done? 17:04
23 A. Not in detail. 17:04
24 Q. Do you know if that process changed after 17:04
25 2012? 17:04

1 A. So I can't really speak to that process. I 17:04
2 don't know. 17:04

3 Q. Do you know if Facebook reviewed privacy 17:04
4 policies of third-party apps to ensure that they 17:05
5 complied with Facebook's own policies before 17:05
6 providing those apps access to Facebook Graph? 17:05

7 MR. FALCONER: Objection. Form. 17:05

8 THE WITNESS: Sorry. Can you say that 17:05
9 again? 17:05

10 BY MR. LOESER: 17:05

11 Q. Do you know if Facebook reviewed the privacy 17:05
12 policies of third-party apps? 17:05

13 A. I -- I don't know. 17:05

14 MR. FALCONER: Objection.

15 THE WITNESS: I'm sorry. 17:05

16 MR. FALCONER: Yeah. Just same objection. 17:05

17 BY MR. LOESER: 17:05

18 Q. Are you familiar with the Facebook data use 17:05
19 policy? 17:05

20 A. Not in -- not -- not specifically. I guess 17:05
21 it's in what context? 17:05

22 Q. Well, have you ever read any version of 17:05
23 Facebook's data use policies? 17:06

24 A. So I don't remember that specifically, but 17:06
25 if you're talking about like a -- like a platform 17:06

1 usage, I mean, I know we have platform terms. 17:06

2 Q. Well, do you -- have you ever reviewed 17:06

3 Facebook's platform policies, platform developer 17:06

4 policies? 17:06

5 A. I mean, I have read it, but I don't remember 17:06

6 all the details of it. 17:06

7 Q. And what about the Facebook data use 17:06

8 policies specifically? Is that something you recall 17:06

9 ever reading? 17:06

10 A. I don't remember. 17:06

11 Q. During all your time working with Facebook 17:06

12 partners, did you ever become aware of any violation 17:06

13 of Facebook policies by any app developer or 17:06

14 partner? 17:06

15 A. Sorry. In what sense? 17:06

16 Q. In any sense. 17:06

17 A. I mean, I've heard that it's happened, but I 17:06

18 don't recall anything specific. 17:07

19 Q. Can you recall any specific instance of a 17:07

20 partner with whom you worked violating any Facebook 17:07

21 platform policy? 17:07

22 A. Again, I don't remember specifically but, 17:07

23 yeah, it's definitely possible. 17:07

24 Q. But you never saw it happen; is that what 17:07

25 you are saying? 17:07

1 A. I don't remember. I don't remember every 17:07
2 instance of my interactions so I don't know. 17:07

3 Q. And there was no platform policy violation 17:07
4 of any partner with whom you worked that you can 17:07
5 specifically recall? 17:07

6 A. Not specifically. 17:07

7 Q. Do you remember generally any platform 17:07
8 violations by any of the partners with whom you 17:07
9 worked? 17:07

10 A. I know that platform violations is possible, 17:07
11 but I don't know specifically who or what. 17:07

12 Q. Are you aware that the data use policy has a 17:08
13 provision that states, "If an application asks 17:08
14 permission from someone else to access your 17:08
15 information, the application will be allowed to use 17:08
16 that information only in connection with the person 17:08
17 that gave the permission and no one else"? 17:08

18 MR. FALCONER: Objection. Form. 17:08

19 THE WITNESS: I don't know that line 17:08
20 specifically off the top of my head. So I'll -- 17:08
21 assuming if you're reading it from an actual thing, 17:08
22 yeah, that's -- 17:08

23 BY MR. LOESER: 17:08

24 Q. And did you observe any situation in which 17:08
25 that specific policy I mentioned was violated by any 17:08

1 app or partner? 17:08

2 MR. FALCONER: Objection. Form. 17:08

3 THE WITNESS: So I don't remember. 17:08

4 MR. LOESER: It we can go to tab 25. 17:09

5 (Exhibit 23 marked for identification.) 17:09

6 BY MR. LOESER: 17:09

7 Q. Miss Chang, I'm showing you what's been 17:09

8 marked Exhibit 23, which is an email from you to 17:10

9 Eddie O'Neil, Marie Hagman and Simon Cross, dated 17:10

10 [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

18 And take a minute to look at your email and 17:10

19 tell me if you recall what you are referring to in 17:10

20 the subject line of this email. 17:10

21 A. Sorry. I'm pulling up the document. Okay. 17:10

22 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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1 the two now. 17:15

2 Q. Okay. And you were very involved in tasks 17:15

3 relating to platform simplification; right? 17:15

4 A. I wouldn't assume that. 17:15

5 Q. You were involved enough to be responsible 17:15

6 for aspects of platform simplification; right? 17:15

7 A. I wouldn't assume that. 17:15

8 Q. Even for --

9 A. Being I supported -- I supported the work 17:15

10 stream, but I can't characterize because I don't 17:15

11 remember if that was my position, so that's why I 17:15

12 wouldn't assume that. 17:15

13 Q. But we have looked at email where you were 17:15

14 assigned a particular task with regard to platform 17:16

15 simplification; right? 17:16

16 A. So assigning to task doesn't mean I -- I own 17:16

17 that. 17:16

18 Q. What does it mean? 17:16

19 A. It means I'm assigned to task. 17:16

20 Q. Having been assigned the task, presumably 17:16

21 you learned something about it? 17:16

22 A. I guess. But, again, I don't know from that 17:16

23 moment in time. It's 2013, so I don't remember at 17:16

24 that moment in time. 17:16

25 [REDACTED]

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[illegible]

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1 year -- the F8 is a big deal, isn't it? 17:27

2 A. The event is. 17:27

3 Q. Yeah. And Mark Zuckerberg gave the keynote 17:27

4 address in 2014; right? 17:27

5 A. Like we saw, yes. 17:27

6 Q. And that's a big deal; right? 17:27

7 A. I -- I don't know if it was back then. 17:27

8 Q. Okay. And in his keynote address, one of 17:27

9 the things he talked about was deprecating friends 17:27

10 permissions; right? 17:27

11 A. I don't know if he used those words exactly, 17:27

12 but whatever the video said. 17:27

13 Q. Okay. What the video said is that Facebook 17:27

14 was going to stop sharing friends data; right? 17:27

15 A. If that's what the video said. I don't 17:27

16 remember it specifically. 17:27

17 Q. We just watched the video, Miss Chang. 17:27

18 A. Right, but I didn't memorize -- 17:27

19 MR. FALCONER: Objection. Argumentative. 17:28

20 BY MR. LOESER: 17:28

21 Q. Okay. So you can't remember what 17:28

22 Mr. Zuckerberg said in the video clip that we showed 17:28

23 you a couple hours ago? 17:28

24 A. Not exactly. 17:28

25 Q. Okay. And we went through the transcript -- 17:28

1 A. We can play it again, I guess. 17:28

2 Q. I read the transcript to you. And in the 17:28

3 transcript, Mr. Zuckerberg says that Facebook was 17:28

4 going to stop letting apps access the content 17:28

5 information of a person's friends who didn't use the 17:28

6 app; right? 17:28

7 A. Is that an exact -- is that an exact 17:28

8 reading? I don't know. 17:28

9 Q. Okay. So that's all -- 17:28

10 A. I --

11 Q. None of that made any sense to you 17:28

12 whatsoever? 17:28

13 A. Again, I don't know if that was specifically 17:28

14 how he said, so I think you've been using things 17:28

15 interchangeably where I don't feel comfortable 17:28

16 agreeing to that. So I don't know what was exactly 17:28

17 said. I don't have the transcript in front of me to 17:28

18 be able to say that's exactly what he said. 17:28

19 Q. Well, fortunately, we have the transcript as 17:28

20 an exhibit. So why don't we go back to that 17:28

21 exhibit. 17:29

22 DEPOSITION REPORTER: Counsel, I don't think 17:29

23 you actually marked the transcript. 17:29

24 MR. LOESER: I think it is Exhibit 17. 17:29

25 DEPOSITION REPORTER: Okay. It is. You're 17:29

1 right. I apologize. 17:29

2 BY MR. LOESER: 17:29

3 Q. If you look at that second highlighted 17:29

4 paragraph. Why don't you read that again, 17:29

5 Miss Chang. 17:30

6 A. "And in the past, when one of your 17:30

7 friend" -- 17:30

8 Q. Go ahead. Sorry. 17:30

9 A. "And in the past, when one of your 17:30

10 friend blogged into an app, in this 17:30

11 case, Ilya, the app could ask him 17:30

12 not only to share his data, but also 17:30

13 data that his friends had shared 17:30

14 with him -- like photos and friend 17:30

15 lists here. So now we're going to 17:30

16 change this, and we're going to make 17:30

17 it so that now everyone has to choose 17:30

18 to share their own data with an app 17:30

19 themselves. 17:30

20 "So we think that this is a really 17:30

21 important step for giving people power 17:30

22 and control over how they share their 17:30

23 data with the apps. And as developers, 17:30

24 this is going to allow you to keep 17:31

25 building apps with all the same great 17:31

1 social features while also giving 17:31

2 people power and control first. So 17:31

3 I am really happy that we're doing 17:31

4 this." 17:31

5 Q. Now, I want to make sure that you understand 17:31

6 what he said here because this is something that 17:31

7 Mr. Zuckerberg included in his keynote address. And 17:31

8 as he says, he was really happy they were doing 17:31

9 this, and the "this" was eliminating friend sharing; 17:31

10 right? Is that -- is that a description that you 17:31

11 agree with? 17:31

12 A. No, I -- 17:31

13 MR. FALCONER: Object. Foundation. 17:31

14 THE WITNESS: No. I don't know if it's 17:31

15 specifically related to that. I can't assume that. 17:31

16 BY MR. LOESER: 17:31

17 Q. Okay. Let's read a sentence and see if we 17:31

18 can develop a common understanding. 17:31

19 "So now we're going to change this 17:31

20 and we're going to make it so that 17:32

21 now everyone has to choose their own 17:32

22 data with a" -- I'm sorry, "That now 17:32

23 everyone has to choose to share their 17:32

24 own data with an app themselves." 17:32

25 Do you understand what that means? 17:32

1 A. Yes. 17:32

2 Q. What does that mean? 17:32

3 A. It means that people have to opt in to share 17:32

4 information. So if they publish something, they 17:32

5 have to opt in to do that. 17:32

6 Q. So that means that if one person downloads 17:32

7 an app, that app can't get access to that person's 17:32

8 friends, unless those friends also opt into that 17:32

9 sharing; is that right? 17:32

10 A. So I don't know specifically if it means to 17:32

11 that. 17:32

12 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

19	Q. Well, he was specifically referring to	17:34
20	getting rid of the ability of apps to access friend	17:34
21	permissions; right?	17:34
22	MR. FALCONER: Objection. Form and	17:34
23	foundation.	17:34
24	THE WITNESS: I don't believe that's what he	17:34
25	said. He said:	17:34

1 "So now we're going to change this 17:34
2 and we're going to make it so that 17:34
3 everyone has to choose to share 17:34
4 their own data with an app 17:34
5 themselves." 17:34

6 BY MR. LOESER: 17:34

7 Q. So, Miss Chang, how do you think Facebook 17:34
8 made that change? What do you think they did? 17:34

9 MR. FALCONER: Objection. Form. 17:34

10 THE WITNESS: They changed the permissioning 17:34
11 model, I'm guessing. 17:34

12 BY MR. LOESER: 17:34

13 Q. Right. Doesn't that mean that they 17:34
14 eliminated the friend sharing APIs? Isn't that what 17:34
15 he's saying? 17:34

16 A. I don't -- 17:34

17 MR. FALCONER: Objection to form and 17:34
18 foundation. 17:34

19 BY MR. LOESER: 17:34

20 Q. Right? 17:34

21 A. So, again, I don't know specifically because 17:34
22 I think you're referring to one thing and I don't 17:35
23 know. 17:35

24 Q. Okay. So looking at this language, you 17:35
25 don't draw any line between making it so everyone 17:35

1 has to choose to share their own data with an app 17:35
2 themselves; you draw no connection in your mind 17:35
3 between that and eliminating friend sharing? 17:35

4 A. Again, I don't know what Mark is 17:35
5 specifically referring to, so I can't make that 17:35
6 assumption or connection. 17:35

7 Q. And having gone through all these emails 17:35
8 that we went through and looking at this language, 17:35
9 you still can't make that connection? 17:35

10 A. I can't. 17:35

11 MR. FALCONER: Derek, we have been going a 17:35
12 little more than an hour. Whenever you hit a 17:36
13 stopping point, can we take a break? 17:36

14 MR. LOESER: Now is fine. 17:36

15 THE VIDEOGRAPHER: This marks the end of 17:36
16 media No. 5 in the deposition of Jackie Chang. 17:36
17 Going off the record. The time is 5:36. 17:36

18 (Off the record.) 17:36

19 THE VIDEOGRAPHER: This marks the beginning 17:56
20 of media No. 6 in the deposition of Jackie Chang. 17:56
21 We are back on the record. The time is 5:57. 17:57

22 BY MR. LOESER: 17:57

23 Q. Miss Chang, before we were talking about the 17:57
24 2014 F8 Conference and I want to make sure I 17:57
25 understand your testimony. Do you generally attend 17:57

1 the F8 Conferences? 17:57

2 A. Not generally. I've been to them, but I 17:57
3 haven't been to all. 17:57

4 Q. And do -- you generally just don't have much 17:57
5 of a role there, so you can't remember much about 17:57
6 it? 17:57

7 A. That depends on which F8. I've spoken at F8 17:57
8 before. 17:57

9 Q. What are the topics on which you've spoken? 17:57

10 A. On Internet.org. 17:57

11 Q. Okay. And what year? Do you recall what 17:57
12 year that was? 17:57

13 A. I don't remember what year exactly. 17:57

14 MR. LOESER: We're going to show you the 17:57
15 next exhibit, which should be -- I know I'm going to 17:57
16 say it wrong, but I think it is Exhibit 24. 17:57

17 (Exhibit 24 marked for identification.) 17:58

18 BY MR. LOESER: 17:58

19 Q. Miss Chang, you should be looking at 17:58
20 Exhibit 24, which is an email from KP to Simon 17:58

21 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

23 Do you see that? 17:58

24 A. Yes. Can I read it? 17:58

25 Q. I'm just going to ask you just about one 17:58

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Q. So, Miss Chang, do you recall that there was 18:02

articles written about the fact that Facebook 18:02

1 partners continued to have access to friends data 18:02

2 after the implementation of Graph API version 2? 18:03

3 A. No. I don't know what articles you're 18:03

4 referencing to. 18:03

5 MR. LOESER: Let's go to the next exhibit. 18:03

6 (Exhibit 25 marked for identification.) 18:03

7 BY MR. LOESER: 18:03

8 Q. And this is Exhibit 25. Miss Chang, this is 18:03

9 a New York Times article from December 16th of -- 18:03

10 June 3rd, 2018. "Facebook Gave Device Makers Deep 18:04

11 Access to Data on Users and Friends." 18:04

12 Do you recall when this article came out? 18:04

13 A. No. 18:04

14 Q. And would it be your normal course to find 18:04

15 out if an article was written about an area that 18:04

16 concerned work that you did at Facebook? 18:04

17 A. No. I think I would be reading articles for 18:04

18 a very long time, so I don't focus a lot on 18:04

19 articles. That would be our communications team. 18:04

20 Q. Okay. So when this article -- and the 18:04

21 subheading is: 18:04

22 "The company formed data-sharing 18:04

23 partnerships with Apple, Samsung and 18:04

24 dozens of other device makers, 18:04

25 raising new concerns about its privacy 18:04

1 protections." 18:04

2 As we saw in the email, you were very 18:04

3 involved in the partnerships and the providing of 18:04

4 extended access to deprecated permissions. 18:04

5 But no one sent this to you and said, hey, 18:04

6 weren't you involved in this? 18:05

7 A. No. 18:05

8 MR. FALCONER: Objection. Form. 18:05

9 BY MR. LOESER: 18:05

10 Q. You've never read this article? 18:05

11 A. No. 18:05

12 Q. And you've never communicated with anyone 18:05

13 about the scandal that surfaced when people figured 18:05

14 out that this had happened? 18:05

15 A. So I don't -- I don't know. 18:05

16 Q. So now, it's not news to you that Facebook 18:05

17 reached data-sharing partnerships with at least 60 18:05

18 device makers; right? That was work you were doing 18:05

19 at Facebook, wasn't it? 18:05

20 A. No. Specifically, I didn't work in that -- 18:05

21 on devices. 18:05

22 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 not an article that anyone brought to your 18:05

2 attention? 18:05

3 A. I don't remember and, again, I didn't work 18:05

4 on devices. 18:06

5 Q. So this is -- you're learning for the first 18:06

6 time as we talk right now that there was a scandal 18:06

7 regarding Facebook continuing to provide friends 18:06

8 data to various partners? 18:06

9 A. Again, I don't remember. 18:06

10 Q. A front-page New York Times article was not 18:06

11 something that came to your attention at Facebook? 18:06

12 A. There's been many, so I don't remember this 18:06

13 specific one. 18:06

14 Q. The scandals are so many that the scandal 18:06

15 with which you were personally involved doesn't 18:06

16 stand out for you? 18:06

17 MR. FALCONER: Objection -- 18:06

18 THE WITNESS: I would not classify it that 18:06

19 way. 18:06

20 MR. FALCONER: -- form, foundation and it 18:06

21 misstates prior testimony. 18:06

22 BY MR. LOESER: 18:06

23 Q. I'm sorry. You can answer. 18:06

24 A. I would not state it the way you did. 18:06

25 MR. LOESER: All right. We can go to the 18:06

1 next exhibit, 26. 18:06

2 (Exhibit 26 marked for identification.) 18:06

3 BY MR. LOESER: 18:07

4 Q. Miss Chang, we're showing you Exhibit 26, 18:07

5 which is an email from Charlotte Edelson to several 18:07

6 people, including yourself, dated August 28th, 2014: 18:07

7 [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

11 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

12 Q. Do you know who Charlotte Edelson is? 18:08

13 A. No, I don't -- I don't remember. 18:08

14 [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED] [REDACTED]

24 [REDACTED] [REDACTED] [REDACTED]

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9 MR. LOESER: We can go to the next exhibit, 18:18
10 which I believe is 27. 18:18

11 (Exhibit 27 marked for identification.) 18:19

12 MR. LOESER: We're uploading the exhibit, 18:19
13 but it's taking a minute. 18:19

14 BY MR. LOESER: 18:19

15 Q. Okay. We're showing you "Quip Business 18:19
16 Portal," dated June 13th, 2018. Are you familiar 18:19
17 with the Quip business portal and how it works? 18:19

18 A. I know Quip, the service. 18:19

19 Q. And we mentioned it previously, but tell me, 18:19
20 what is the Quip service? 18:19

21 A. It's a document-sharing service like Google 18:19
22 Docs. 18:19

23 Q. So it allows you to work with other people 18:19
24 on a document in real time? 18:20

25 A. Yes. 18:20

1 Q. And is this something that you frequently 18:20
2 use or not? 18:20

3 A. I've used it. I used it at whatever time 18:20
4 the service was available just because we have a lot 18:20
5 of rotating services. 18:20

6 Q. And is the -- is the service searchable? 18:20

7 A. Yes. 18:20

8 Q. How does that work? 18:20

9 A. There's a search header in the service and 18:20
10 you can search for topics. 18:20

11 Q. Do you know when Facebook started using the 18:20
12 Quip service? 18:20

13 A. I don't know exactly when. 18:20

14 Q. And is it something that's widely used at 18:20
15 Facebook? 18:20

16 A. Not now. 18:20

17 Q. When was it widely used? 18:20

18 A. I don't remember the years, but there was a 18:20
19 time where it was being used before us getting -- 18:21
20 before Google Docs. 18:21

21 Q. And so it's something that Facebook stopped 18:21
22 using? 18:21

23 A. Well, they're encouraging people to stop 18:21
24 using it, but I think there are still documents 18:21
25 there. 18:21

1 Q. Okay. And what are people now using instead 18:21

2 for the same type of functionality? 18:21

3 A. Google Docs. 18:21

4 Q. And do you use Google Docs now? 18:21

5 A. Yes. 18:21

6 Q. And when did you start using Google Docs? 18:21

7 A. I don't remember the year specifically. 18:21

8 [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

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Q. 2017 -- I can't tell from your LinkedIn, but 18:25

2007 through September 2019, it says "Head of

business partner business platform partnerships."

DEPOSITION REPORTER: Can you repeat that

again?

BY MR. LOESER:

Q. It looks like in 2017, you started with 18:25

Internet.org and then you transitioned to head of 18:25

business platform partnerships.

Do you know when in the year you 18:25

transitioned to head of business platform 18:25

partnerships? 18:25

A. So I don't know the specific dates, and I 18:25

didn't come in as head of business partnership. I 18:25

was a partner manager and then eventually left the 18:25

role as head. 18:26

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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Exhibit 28 is an email that will materialize 18:29

9

momentarily. 18:29

10

(Exhibit 28 marked for identification.) 18:29

11

BY MR. LOESER: 18:29

12

Q. So, Miss Chang, we are showing you an email 18:29

13

dated October 16th, 2019, that appears like it was 18:29

14

sent to yourself, sent from you to you and also to 18:29

15

Joel Yawili, that includes a chat message. 18:29

16

Who is Joel Yawili? 18:30

17

A. Joel. 18:30

18

Q. Joel. 18:30

19

A. He was someone on the team and reported to 18:30

20

me at some point in time. I don't remember the 18:30

21

exact period of time. 18:30

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Q. Miss Chang, what do you know about the

18:35

1 Cambridge Analytica scandal on Facebook? 18:35

2 A. What I know is what I've read, which is 18:36

3 dealing with like a researcher taking the 18:36

4 information and selling it to, I believe, a 18:36

5 Cambridge Analytica, which is a political agency. 18:36

6 Q. And the researcher was Aleksandr Kogan; is 18:36

7 that right? 18:36

8 A. I believe that's his name. 18:36

9 Q. And the problem started with an app that 18:36

10 obtained a whole lot of friends data; is that right? 18:36

11 A. So I don't know the specifics of it. 18:36

12 Q. And how many articles would you say you've 18:36

13 read about the Cambridge Analytica scandal? 18:36

14 A. I don't know. 18:36

15 Q. Have there been any briefings internal to 18:36

16 Facebook that you attended to which the Cambridge 18:37

17 Analytica scandal was discussed? 18:37

18 A. I don't recall. 18:37

19 Q. Do you recall whether it was -- that was a 18:37

20 significant event at Facebook? 18:37

21 A. Yes. 18:37

22 Q. And did you ever cross paths with Aleksandr 18:37

23 Kogan or Cambridge Analytica in your work with 18:37

24 partners or researchers? 18:37

25 A. Sorry, like him physically or... 18:37

1 Q. No, just in your work. Or the partners or 18:37
2 was that a researcher that you ever interacted with 18:37
3 in your job at Facebook? 18:37

4 A. No. 18:37

5 Q. Are you --

6 A. I did not interact with him. Sorry. 18:37

7 Q. I'm sorry. Go ahead. 18:37

8 A. Oh, I said, I did not interact with him. 18:37

9 Q. Have you ever worked with political 18:37
10 advertisers? 18:37

11 A. Not to my knowledge. 18:37

12 Q. Are you aware that Facebook worked with 18:37
13 Cambridge Analytica during the 2016 Presidential 18:38
14 campaign? 18:38

15 A. So I don't know the details enough to -- I 18:38
16 don't know. 18:38

17 Q. That's not something that you were 18:38
18 particularly interested in learning about? 18:38

19 A. No. 18:38

20 Q. Now, you understand that the Cambridge 18:38
21 Analytica scandal had to do with the ability of an 18:38
22 app to obtain content information about the app 18:38
23 user's friends; right? 18:38

24 A. So, again, I don't know the details enough 18:38
25 where I would say I know that. 18:38

1 Q. So that's not something that you've gleaned 18:38
2 from the pending article you have read about the 18:38
3 Cambridge Analytica scandal? 18:39

4 A. I don't feel comfortable making that 18:39
5 assumption, so I don't know. I don't remember those 18:39
6 words exactly or anything. 18:39

7 Q. Okay. Did you read that it started with a 18:39
8 This is a Your Digital Life app that a hundred and 18:39
9 something thousand people downloaded, and from that, 18:39
10 content information was obtained for 87 million 18:39
11 Facebook users? 18:39

12 A. I don't know that specifically. 18:39

13 Q. Is that generally your understanding of what 18:39
14 happened? 18:39

15 A. Not to that specificity, but so like I said 18:39
16 earlier, the information that he sold. 18:39

17 Q. Okay. But is it your general understanding 18:39
18 that a relatively small number of people used an 18:39
19 app, and from that app, a very large number of 18:39
20 people ended up having their information obtained by 18:39
21 that app? 18:39

22 A. So, again, I -- I don't know specifically. 18:39

23 Q. I'm not asking you specifically. I'm just 18:40
24 asking just for the very most basic of your 18:40
25 understanding of the problem. 18:40

1 And do you have any understanding that a 18:40
2 small number or relatively small number of app users 18:40
3 caused a relatively large number of Facebook users 18:40
4 to share their information with the app? 18:40

5 A. So as you said, it's all relative, which is 18:40
6 why I don't feel comfortable making assertions on 18:40
7 how relative it is because I don't know in detail to 18:40
8 make that assumption. 18:40

9 Q. So you're saying that you can't testify to 18:40
10 any degree or in any way about whether the This is 18:40
11 Your Digital Life app was downloaded by a relatively 18:40
12 small number of people and, because of that, a whole 18:40
13 lot of people had their information shared with the 18:40
14 app who did not download the app? That's not 18:40
15 something that kind of jumped out at you from 18:40
16 reading anything about this scandal? 18:40

17 MR. FALCONER: Objection. Asked and 18:40
18 answered. 18:40

19 THE WITNESS: So those are your words and I 18:40
20 don't know if that's what was stated. I don't know 18:40
21 in specificity where I would stand behind that, 18:41
22 especially if I'm supposed to testify to what I 18:41
23 know. So I don't know that specifically. 18:41

24 BY MR. LOESER: 18:41

25 Q. And do you understand that it was friends 18:41

1 permissions that are at the heart of the ability of 18:41
2 the This is Your Digital Life app to obtain content 18:41
3 information for so many Facebook users? 18:41

4 A. So I don't know. 18:41

5 Q. Okay. And that's not something that you 18:41

6 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

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1 [REDACTED]

2 MR. LOESER: We can go to Exhibit 29. 18:43

3 (Exhibit 29 marked for identification.) 18:43

4 BY MR. LOESER: 18:44

5 Q. Miss Chang, Exhibit 29 is an email from 18:44

6 Jackie Rooney, dated March 22nd, 2018, to the mteam. 18:44

7 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

22 Q. Do you attend any of them? 18:45

23 A. Probably a couple. 18:45

24 Q. And why don't you spend a minute to look 18:45

25 through this one, and you can tell me if you 18:45

1 attended this one. 18:45

2 A. I don't know. 18:45

3 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

8 So it appears they were going to celebrate 18:46

9 your 11 years at Facebook? 18:46

10 A. Yes. 18:46

11 Q. Do you recall anyone congratulating you in a 18:46

12 briefing on your 11 years at Facebook? 18:46

13 A. I mean, I don't know that one specifically. 18:46

14 They tend you call you out every Faceversary, so I 18:46

15 don't know if this specific one. 18:46

16 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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1 (Off the record.) 18:53

2 THE VIDEOGRAPHER: This marks the beginning 18:59

3 of media No. 7 in the deposition of Jackie Chang. 18:59

4 Back on the record. The time is 6:59. 18:59

5 MR. LOESER: Miss Chang, I have no further 18:59

6 questions for you at this time. However, I will 18:59

7 note for the record that we are evaluating the 18:59

8 transcript and the testimony in light of Special 19:00

9 Master Garrie's comments, and we will communicate 19:00

10 with your counsel as to whether we intend to recall 19:00

11 you. 19:00

12 And with that, I know you have something 19:00

13 else to do for tonight so we can close for the 19:00

14 evening. 19:00

15 MR. FALCONER: Yeah, I mean, if there are 19:00

16 other questions, I think Miss Chang is available to 19:00

17 answer them now. 19:00

18 MR. LOESER: Well, Counsel, a couple minutes 19:00

19 ago, you told me that she needed to leave so I was 19:00

20 trying to do her the courtesy of allowing that to 19:00

21 happen. 19:00

22 If we have other questions, it would be 19:00

23 based upon our review of the testimony and the 19:00

24 discussion of certain exhibits, so it will take us a 19:00

25 bit to sort that out. And I don't want to make a 19:00

1 rash decision, so we will just reserve our rights 19:00

2 under that and with regard to Special Master 19:00

3 Garrie's comments and get back to you. 19:00

4 MR. FALCONER: Sure. And we will reserve 19:00

5 all rights as well. I can't remember what the 19:00

6 protocol says about whether we need to say we are 19:00

7 going to read and sign, so I will state it, we will 19:01

8 read and sign, and we will reserve questions. 19:01

9 MR. LOESER: Okay. Thank you, Miss Chang, I 19:01

10 appreciate your time today. And, Russ, I appreciate 19:01

11 your involvement as well. It is a good start to a 19:01

12 lot of depositions that will be taken in terms of 19:01

13 the counsel communicating clearly and effectively 19:01

14 without wasting a lot of time on the record, so I 19:01

15 really appreciate that. 19:01

16 THE VIDEOGRAPHER: Is there anything else we 19:01

17 need on the record before I close out? 19:01

18 DEPOSITION REPORTER: Counsel, I need 19:01

19 orders. I know Gibson Dunn has a three-day expedite

20 and a rough. What is your order?

21 MS. WEAVER: We'd like the same.

22 DEPOSITION REPORTER: Thank you. Who was

23 it that said that? I'm sorry.

24 MS. WEAVER: It's God. No, it's Lesley

25 Weaver, and I apologize.

1 DEPOSITION REPORTER: Thank you. I'm 19:01

2 ready. 19:01

3 THE VIDEOGRAPHER: Okay. We are off the 19:01
4 record at 7:01 p.m. and this concludes today's 19:01
5 testimony given by Jackie Chang. The total number 19:01
6 of media units used was seven and will be retained 19:01
7 by Veritext Legal Solutions. 19:02

8 (Off the record.) 19:02

9 DEPOSITION REPORTER: We're back on the 19:02
10 record. 19:02

11 MR. FALCONER: Facebook requests a 19:02
12 provisional confidentiality designation for the 19:02
13 transcript from today. 19:02

14 MR. LOESER: Understood. 19:02

15 (Ending time: 7:02 p.m.)

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I, Jackie Chang, do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

EXECUTED this ____ day of _____,
2021, at _____, - _____.
(City) (State)

Jackie Chang

1 I, JANIS JENNINGS, CSR No. 3942, Certified
2 Shorthand Reporter, certify:

3 That the foregoing proceedings were taken
4 before me at the time and place therein set forth, at
5 which time the witness was duly sworn by me;

6 That the testimony of the witness, the
7 questions propounded, and all objections and statements
8 made at the time of the examination were recorded
9 stenographically by me and were thereafter transcribed;

10 That the foregoing pages contain a full, true
11 and accurate record of all proceedings and testimony.

12 Pursuant to F.R.C.P. 30(e)(2) before
13 completion of the proceedings, review of the transcript
14 [X] was [] was not requested.

15 I further certify that I am not a relative or
16 employee of any attorney of the parties, nor financially
17 interested in the action.

18 I declare under penalty of perjury under the
19 laws of California that the foregoing is true and
20 correct.

21 Dated: 12/21/2021

22

23 <%044,Signature%>

24 JANIS JENNINGS, CSR NO. 3942

25 CLR, CCRR

1 RUSSELL H. FALCONER, ESQ.

2 rfalconer@gibsondunn.com

3 December 21, 2021

4 RE: IN RE: FACEBOOK, INC. CONSUMER

5 PRIVACY USER PROFILE LITIGATION

6 12/16/2021, JACKIE CHANG, JOB NO. 49769494

7 The above-referenced transcript has been
completed by Veritext Legal Solutions and

8 review of the transcript is being handled as follows:

9 ___ Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext
10 to schedule a time to review the original transcript at
11 a Veritext office.

12 ___ Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF
13 Transcript - The witness should review the transcript and
14 make any necessary corrections on the errata pages included
15 below, notating the page and line number of the corrections.
16 The witness should then sign and date the errata and penalty
17 of perjury pages and return the completed pages to all
18 appearing counsel within the period of time determined at
19 the deposition or provided by the Code of Civil Procedure.

20 ___ Waiving the CA Code of Civil Procedure per Stipulation of
21 Counsel - Original transcript to be released for signature
22 as determined at the deposition.

23 ___ Signature Waived - Reading & Signature was waived at the
24 time of the deposition.

25

1 _X_ Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF

2 Transcript - The witness should review the transcript and
3 make any necessary corrections on the errata pages included
4 below, notating the page and line number of the corrections.
5 The witness should then sign and date the errata and penalty
6 of perjury pages and return the completed pages to all
7 appearing counsel within the period of time determined at
8 the deposition or provided by the Federal Rules.

9 ___ Federal R&S Not Requested - Reading & Signature was not
10 requested before the completion of the deposition.

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1 IN RE: FACEBOOK, INC. CONSUMER PRIVACY USER PROFILE LITIGATION
2 JACKIE CHANG (JOB NO. 4976949)

3 E R R A T A S H E E T

4 PAGE _____ LINE _____ CHANGE _____

5 _____

6 REASON _____

7 PAGE _____ LINE _____ CHANGE _____

8 _____

9 REASON _____

10 PAGE _____ LINE _____ CHANGE _____

11 _____

12 REASON _____

13 PAGE _____ LINE _____ CHANGE _____

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15 REASON _____

16 PAGE _____ LINE _____ CHANGE _____

17 _____

18 REASON _____

19 PAGE _____ LINE _____ CHANGE _____

20 _____

21 REASON _____

22 _____

23 _____

24 WITNESS _____ Date _____

25 _____